B.1.3

FACT SHEET

Columbus Coated Fabrics
OHD 004-294-351

I. INTRODUCTION

On May 19, 1980, (45 FR 33066) pursuant to the requirements of Section 3001 through 3006 of the Resource Conservation and Recovery Act, as amended, (RCRA or the Act), the United States Environmental Protection Agency (U.S. EPA) promulgated regulations to protect human health and the environment from the improper management of hazardous waste. Section 3005 of the Act and Code of Federal Regulations, 40 CFR Parts 270 and 124, established a permit system governing the storage of hazardous wastes. Final regulations for storage facilities appeared in the Federal Register of January 12, 1981. These regulations enable U.S. EPA to issue permits for hazardous waste storage facilities in the State of Ohio. A facility which receives a RCRA permit shall comply with U.S. EPA regulations pertaining to design, operation, performance, accident prevention and prepardness, closure and financial responsibility. This Fact Sheet briefly describes the derivation of conditions of the draft permit in support of U.S. EPA's proposal to issue a RCRA permit to Columbus Coated Fabrics, 1280 North Grant Street, Columbus, Ohio to store hazardous wastes.

On December 9, 1983, Columbus Coated Fabrics submitted its revised and complete application for a RCRA permit in accordance with 40 CFR Section 270.14. To receive a RCRA permit, a facility shall demonstrate compliance with applicable technical standards in 40 CFR Part 264 published on May 19, 1980, (45 FR 33221) January 12, 1981, (46 FR 2848), and January 23, 1981, (46 FR 7676), as well as finanical requirements published on April 7, 1982, (47 FR 15047) and April 16, 1982, (47 FR 16554). After reviewing Columbus Coated Fabric's application, U.S. EPA has tentatively determined that the above standards and requirements have been met. The draft permit condition includes all of these requirements. The preambles to the May 19, 1980; January 12, 1981; January 23, 1981; June 24, 1982, regulations explain the rationale for these requirements.

Also incorporated in the draft permit conditions are requirements for the facility to comply with the terms of its proposed Waste Analysis Plan, Preparedness and Prevention Plan, Personnel Training Plan, and Closure Plan. These items have been determined by U.S. EPA as necessary to comply with the technical standards governing the storage of hazardous waste.

II. FACILITY DESCRIPTION

Columbus Coated Fabrics is located in Columbus, Ohio at 1280 North Grant Street. It is primarily a manufacturer of decorative vinyl products. Hazardous wastes are generated from the manufacturing process as well as from a solvent recycling operation. The hazardous wastes generated at this location are stored in containers prior to shipment off-site for treatment or disposal.

The hazardous wastes generated and stored temporarily at Columbus Coated Fabrics include spent halogenated solvents, spent non-halogenated solvents, residue or still bottoms from recovery of spent non-halogenated solvents, and electroplating sludge.

The hazardous waste storage facility at Columbus Coated Fabrics has a maximum capacity of 24,750 gallons. The drums containing hazardous wastes are stored on impervious concrete and the storage facility is designed to contain any inadvertent leak or spill.

III. SUMMARY OF BASIS FOR PERMIT CONDITIONS

This section of the fact sheet provides a brief summary of the permit conditions in the draft permit. All citations of the regulations refer to the regulation as codified in Title 40 of the Code of Federal Regulations (40 CFR).

A. Standard Permit Conditions

Standard permit conditions I.A to I.G are regulatory requirements of 40 CFR Part 270. These conditions are of a general nature and are applicable to all hazardous waste management facilities regulated pursuant to a U.S. EPA RCRA permit.

B. General Facility Conditions

General facility conditions II.A. to II.Q. are regulatory requirements of 40 CFR Part 264. These conditions are of a general nature and are applicable to all hazardous waste management facilities regulated pursuant to a U.S. EPA RCRA permit.

C. Storage In Containers

Conditions III.A. to III.G. are regulatory requirements of 40 CFR Part 264. These conditions are applicable to all hazardous waste management facility that store hazardous waste in containers pursuant to a U.S. EPA permit.

Permit Condition	Subject	Regulation (40 CFR)
I. STANDARD CONDITIONS		
I.A.	Effect of Permit	§270.4 & 270.30(g)
I.B.	Permit Actions	§270.30(f), 270.41, §270.42, 270.43 & §264.112
I.C.	Severability	Standard Practice
I.D.1.	Duty to Comply	§270.30(a)
I.D.2.	Duty to Reapply	§270.30(b) & 270.10(h)
I.D.3.	Permit Expiration	§270.51
I.D.4.	Need to Halt or Reduce Activity not a Defense	§270.30(c)
I.D.5.	Duty to Mitigate	§270.30(d)
I.D.6.	Proper Operation and Maintenance	§270.30(e)
I.D.7.	Duty to Provide Information	§270.30(h) & 264.74(a)
I.D.8.	Inspection and Entry	§270.30(i)
I.D.9.	Monitoring and Records	§270.30(j)
I.D.10.	Reporting Planned Changes	§270.30(l)(1)
I.D.11.	Certification of Construction or Modification	§270.30(l)(2)
I.D.12.	Anticipated Noncompliance	§270.30(l)(2)
I.D.13.	Transfer of Permits	§270.30(l)(3), 270.40 & §264.12(c)
I.D.14	Compliance Schedules	§270.30(l)(5) & 270.33
I.D.15.	Twenty-Four Hour Reporting	§270.30(l)(6) & 264.56 (d), (i) and (j)
I.D.16.	Other Noncompliance	§270.30(l)(10)
I.D.17.	Other Information	§270.30(l)(11)
I.D.18.	Submittal of Written Reports	§270.30((h)
I.E.	Signatory Requirement	§270.11 & 270.30(k)
I.F.	Confidential Information	§270.12
I.G.	Documents to be Maintained at Facility Site	§264.13(b), 264.16(d) §264.53(a), 264.122(a) §264.142(a), 264.73, §264.15(b)

Permit Condition	Subject	Regulation (40 CFR)
II. GENERAL FACILITY CONDITIONS		
II.A.	Design and Operation of Facility	§264.31
II.B.	Required Notice	§264.12
II.C.	General Waste Analysis	§264.13
II.D.	Security	§264.14
II.E.	General Inspection Requirements	§264.15
II.F.	Personnel Training	§264.16
II.G.	General Requirements for Ignitable, Reactive and Incompatible Waste	§264.17
II.H.	Preparedness and Prevention	
II.H.1.	Required Equipment	§264.32
II.H.2.	Testing and Maintenance of Equipment	§264.33
II.H.3.	Access to Communications or Alarm System	§264.34
II.H.4.	Required Aisle Space	§264.35
II.H.5.	Arrangements with Local Authorities	§264.37
II.I.	Contingency Plan	
II.I.1.	Implementation of Contingency Plan	§264.51
II.I.2.	Copies of the Contingency Plan	§264.53
II.I.3.	Amendments to the Contingency Plan	§264.54
II.I.4.	Emergency Coordinator	§264.55
II.J.	Manifest System	§264.71, §264.72 §264.76, §270.30(1)(7), §270.30(1)(8)
II.K.1.	Operating Record	§264.73
II.K.2.	Biennial Report	§264.75, §270.30(1)(g)

Permit Condition	Subject	Regulation (40 CFR)
II.L.1.	Closure Performance Standard	§264.111
II.L.2.	Amendment to Closure Plan	§264.112(b)
II.L.3.	Notification of Closure	§264.112(c)
II.L.4.	Time Allowed for Closure	§264.113
II.L.5.	Disposal or Decontamination of Equipment	§264.114
II.L.6.	Certification of Closure	§264.115
II.M.	Closure Cost Estimate	§264.142
II.N.	Financial Assurance for Facility Closure	§264.143
II.O.	Liability Requirements	§264.147
II.P.	Incapacity of Owners or Operators, Generators or Financial Institutions	§264.148
II.Q	Financial Assurance and Documentation Requirements	§264.149

Permit Condition	Subject	Regulation (40 CFR)
III. STORAGE IN CONTAINERS		
III.A.	Waste Identification	§270.13(i)
III.B.	Condition of Containers	§264.171
III.C.	Compatibility of Wastes with Containers	§264.172
III.D.	Management of Containers	§264.173
III.E.	Containment	§264.175
III.F.	Special Requirements for Ignitable or Reactive Waste	§264.176
III.G.	Special Requirements for Incompatible Waste	§264.177

DRAFT

RCRA ~~FINAL~~ PERMIT SIGN-OFF

PART I. BACKGROUND

FACILITY NAME: Columbus Coated Fabrics

FACILITY LOCATION: Columbus, Ohio

RCRA ID NUMBER: OHD 004-294-351

TYPE OF PERMIT

X Storage	___ Treatment	___ Disposal
X Container	___ Tank	___ Injection Well
___ Tank	___ Surface Impoundment	___ Landfill
___ Waste Pile	___ Incinerator	___ Land Application
___ Surface Impoundment	___ Other (Detonation)	___ Surface Impoundment

PART II. REVIEW PACKAGE CONTENT

- X Draft ~~Final~~ Permit w/Attachments
- ___ Responsiveness Summary
- ___ Letter to Applicant
- ___ Letter to Commentors
- X Administrative Record
- ___ _____

PART III. CONCURRENCES

	WASTE MANAGEMENT BRANCH	INITIALS	DATE	AGREE	DISAGREE
1.	TECH. PERMIT CONTACT, C.Slaustas	CBS	5/7/84	(X)	( )
2.	CHIEF, STATE TECHNICAL UNIT	DJB	5/7/84	(X)	( )
3.	CHIEF, TP&C SECTION, Acting	WEM	5/15/84	(X)	( )
~~4.~~	~~CHIEF, WASTE MAN. BRANCH~~			( )	( )
	OFFICE OF REGIONAL COUNSEL				
5.	ASSIST. REG. COUNSEL, Mary Bryant	MCB	5/21/84	(X)	( )
	Note typos, misspellings, and minor questions on clipped pages.				
6.	CHIEF, SOLID WASTE & EMER. RESPONSE BR.	JM6	5/21/84	(Y)	( )
~~7.~~	~~REGIONAL COUNSEL~~			( )	( )

PART IV. APPROVAL

	~~DIRECTOR, WASTE MANAGEMENT DIVISION~~			( )	( )

cc: Section Log
ORC

04/-25

UNI' ' STATES ENVIRONMENTAL PROTECTI' AGENCY
REGION V
HAZARDOUS WASTE MANAGEMENT PERMIT

Name of Permittee: Columbus Coated Fabrics

Facility Location: 1280 North Grant Avenue, Columbus, Ohio

EPA Identification Number: OHD 004-294-351

Effective Date: _____

Expiration Date: Ten (10) years after the effective date

Authorized Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC., §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (U.S. EPA) codified and to be codified in Title 40 of the Code of Federal Regulations, a permit is issued to Columbus Coated Fabrics (hereafter called the Permittee) to operate a hazardous waste storage facility located in Columbus, Ohio at latitude 39 degrees 59' 23" and longitude 82 degrees 59' 43". You are authorized to conduct the following hazardous waste management activities:

X Storage	___ Treatment	___ Disposal
X Container	___ Tank	___ Injection Well
___ Tank	___ Surface Impoundment	___ Landfill
___ Waste Pile	___ Incinerator	___ Land Application
___ Surface Impoundment	___ Other (Detonation)	___ Surface Impoundment

Applicable Regulations:

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

X 261	X 264, Subpart G	___ 264, Subpart K
X 262	X 264, Subpart H	___ 264, Subpart L
X 264, Subpart A-E	X 264, Subpart I	___ 264, Subpart O
___ 264, Subpart F	___ 264, Subpart J	X 270

Permit Approval:

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit (see 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the final permit application, as amended, (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.42 and §270.43) and potential enforcement action. The Permittee must inform U.S. EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

Issued this_____ day of _____

by_____
Basil G. Constantelos, Director
Waste Management Division

This is an unsigned copy of the permit. The number at the bottom may suggest it was in the docket file. It was given to me loose. Jane Neumann

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT II
Waste Analysis Plan

Columbus Coated Fabrics
1280 North Grant Street
Columbus, Ohio

U.S. EPA ID #: OHD 004-294-351

DATE: September 30, 1982
REVISION NO: 0

STILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-4385

BORDEN INC.-COLS. COATED FABRICS
1280 N. GRANT AVE.
COLUMBUS, OHIO
BILL ILG

LAB NO. 132
JOB 92-5033-26
DATE FEB. 18, 82

LOCATION COLLECTED CCF28 LIQ. STILL BOT.

PRESERVATIVES USED -

DATE COLLECTED - - - FEB. 1, 82

TIME COLLECTED - - - 0000

FIELD PH - - - - - -

DATE RECEIVED - - - FEB. 2, 82

TEST	VOL. (ML.)	DILTN FACT.	RESULT	UNIT
CORROSIVITY				PH-SU
IGNITABILITY			<22 72	C/F
ARSENIC			<0.005	MG/L
BARIUM			<1.0	MG/L
CADMIUM			2.4	MG/L
CHROMIUM			0.22	MG/L
LEAD		10	14.0	MG/L
MERCURY				MG/L
SELENIUM			<0.005	MG/L
SILVER			<0.1	MG/L

PROJECT MANAGER Thomas A. Flippo
(THOMAS A. FLIPPO)

DA : September 30, 1982
REVISION NO: 0

Stilson Laboratories, Inc.
Columbus and Cleveland, Ohio

ADDRESS REPLY TO: 170 N. HIGH ST. COLUMBUS, OHIO 43215
PHONE: 614/228-4388

E.P. TOXICITY
40 CFR 261.24

Client: Borden, Inc.
Columbus Coated Fabrics
1280 Grant Avenue
Columbus, Ohio 43201
Attn: Bill Ilg

Lab Number 8450
Job Number 92-5033-19
Date Reported 12/3/80

Location Collected Borden-PC 3 DUST STOP OIL AND PLASTICIZER RESIDUE
Date Collected 11/19/80
e Received 11/19/80

EPA Hazardous Waste No.	Contaminant	Result milligrams/liter	Maximum Concentration milligrams/liter
D004	Arsenic		5.0
D005	Barium	80.	100.0
D006	Cadmium	6.0	1.0
D007	Chromium	< .1	5.0
D008	Lead	2.2	5.0
D009	Mercury		0.2
D010	Selenium		1.0
D011	Silver		5.0
D012	Endrin		0.02
D013	Lindane		0.4
014	Methoxychlor		10.0
015	Toxaphene		0.5
D016	2,4-D		10.0
D017	2,4,5-TP Silvex		1.0

DATE September 30, 1982

STILSON LABORATORIES, INC REVISION NO: 0
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-4385

COLS. COATED FABRICS-BORDEN, INC
P.O. BOX 208
COLUMBUS, OHIO 43216
ACCOUNTS PAYABLE

LAB NO. 48
JOB 92-5033-24
DATE AUG. 31, 81

LOCATION COLLECTED LIMESTONE SUMP CCF-23

PRESERVATIVES USED -

DATE COLLECTED - - - JULY 27, 81

TIME COLLECTED - - - 0000

FIELD PH - - - - - -

DATE RECEIVED - - - AUG. 7, 81

TEST	VOL. (ML)	DILTN FACT.	RESULT	UNIT
ARSENIC			<0.005	MG/L
BARIUM			<1.0	MG/L
CADMIUM			<0.1	MG/L
CHROMIUM			11.6	MG/L
LEAD			<0.1	MG/L
MERCURY			<0.0005	MG/L
SELENIUM			<0.005	MG/L
SILVER			<0.1	MG/L

PROJECT MANAGER Thomas A. Flippo (GLH)

(THOMAS A. FLIPPO)

(3) Waste Analysis Plan

(i) A copy of the CCF Waste Analysis Plan is shown on Page 39.

(ii) Table I shows Hazardous Waste Parameters and Rationale. EP Toxicity and Ignitability will be tested annually for the listed hazardous wastes.

(iii) Sampling Methods are as follows:

All Wastes are sampled by the sampling methods described in "Test Methods for Evaluating Solid Waste". Physical/ Chemical Methods U.S. EPA SW846 Second Edition. Equipment used for sampling is as described on Pg. 38c (from Table I SW-846).

Dust Stop/Still Bottom Wastes - Solid Wastes - Samples are taken from (6) random drums with a trier as shown on Pg. 38d (from SW-846) by the procedure described on Pg. 38e (from SW-846). A composite is then sent to the lab for analysis in glass jars. No preservatives are required or used.

Dust Stop/Still Bottom Wastes - Liquid Wastes - Samples are taken from (6) random drums with a Coliwasa as shown on Pg. 38f (from SW-846) by the procedure described on Pg. 38g (from SW-846). A composite is then sent to the lab for analysis in glass jars. No preservatives are required or used.

Electroplating Waste - A grab sample is taken from the pit with a Dipper as shown on Pg. 38h (from SW-846) by the procedure described on Pg. 38i (from SW-846). The sample is then sent to the lab in a glass jar. No preservatives are required or used.

(iv) Solids Test

A stick is pushed into the material and removed. If any free liquid drips off the stick after removal, it is considered liquid. If the stick is dry or the sludge is of mayonaise consistency, the material is considered solid. If a small quantity of free liquid exists, absorbent material and/or ashes are added and stirred into the sludge until it is determined by the stick test the material is solid.

This test is as prescribed by the landfill operator (CECOS Inc., Williamsburg, Ohio).

(v) Sample Log

A sample log is maintained stating type of sample taken, method used to obtain sample and the date it was sent to the Stilson Laboratory for analysis.

DATE: May 6, 1983
REVISION NO.: 0

STILSON Laboratories, Inc.
170 NORTH HIGH ST., COLUMBUS, OHIO 43215 614/228-4385

April 20, 1983

Borden, Inc.
Columbus Coated Fabrics
1280 Grant Avenue
Columbus, Ohio 43201

Attn: Mr. Bill Ilg

Dear Bill:

This letter is to inform you that all hazardous waste analyses have been performed in accordance with SW-846, Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods.

Please call me at once if further information is required.

Sincerely,

STILSON LABORATORIES, INC.

Thomas A. Flippo
Biologist

TAF/lkd

STILSON Laboratories, Inc.
170 NORTH HIGH ST., COLUMBUS, OHIO 43215 614/228-4385

DATE: September 30, 1983
REVISION NO: 0

September 02, 1983

Borden, Inc.
Columbus Coated Fabrics
1280 Grant Avenue
Columbus, Ohio 43201

Attn: Bill Ilg

Re: SW 846, Test Methods for Evaluating Solid Wastes

Dear Mr. Ilg:

The following is a list of test parameters and their corresponding method numbers:

PARAMETERS	METHOD NUMBERS
E. P. Toxicity	1310
Ignitibility	1010
Corrosivity	9040
Arsenic	7060
Barium	7080
Cadmium	7130
Chromium	7190
Lead	7420
Mercury	7470
Selenium	7740
Silver	7760

All of the above methods appear in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods-SW846, 2nd. Edition. USEPA.

If you have any additional questions, please do not hesitate to call.

Sincerely,

STILSON LABORATORIES, INC.

Thomas A. Flippo

Thomas A. Flippo

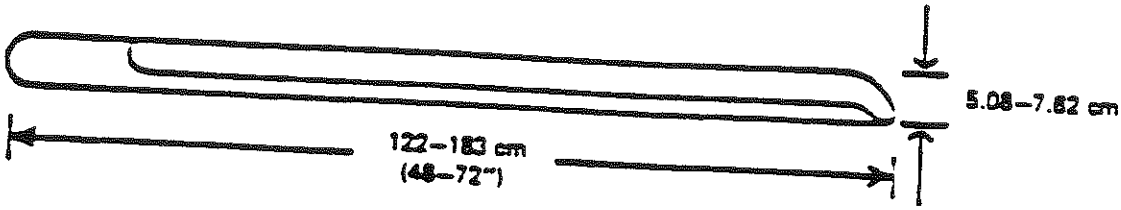
TAF/lkd

TABLE 1. SAMPLING EQUIPMENT FOR PARTICULAR WASTE TYPES

Waste type	Waste location or container										
	Drum	Sacks and bags	Open bed truck	Closed bed truck	Storage tanks or bins	Waste piles	Ponds, lagoons, & pits	Conveyor belt	Pipe		
Free flowing liquids and slurries	Coliwasa	N/A	N/A	Coliwasa	Weighted bottle	N/A	Dipper	N/A	Dipper		
Sludges	Trier	N/A	Trier	Trier	Trier	a	a				
Moist powders or granules	Trier	Trier	Trier	Trier	Trier	Trier	Trier	Shovel	Dipper		
Dry powders or granules	Thief	Thief	Thief	Thief	Thief	Thief	Thief	Shovel	Dipper		
Sand or packed powders and granules	Auger	Auger	Auger	Auger	a	a	a	Dipper	Dipper		
Large rained olids	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Trier	Dipper		

[a]This type of sampling situation can present significant logistical sampling problems, therefore sampling equipment must be specifically selected or designed based on site and waste conditions. No general statement about appropriate sampling equipment can be made.

14 / SAMPLING - Implementation



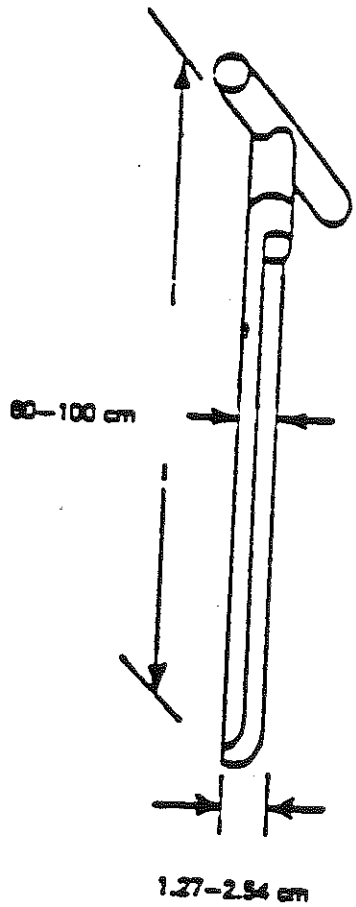


Figure 5. Sampling triers.

Procedure

1. Clean trier.

2. Insert trier into waste material 0 to 45° from horizontal. Rotate trier to cut a core of the waste. Remove trier with concave side up and transfer sample to container.

1.2.1.6 Auger

Scope and Application

An auger consists of sharpened spiral blades attached to a hard metal central shaft. An auger samples hard or packed solid wastes or soil.

Apparatus

Augers are available at hardware and laboratory supply stores.

Procedure

1. Clean sampler.

2. Bore a hole through the middle of an aluminum pie pan large enough to allow the blade of the auger to pass through. The pan will be used to catch the sample brought to the surface by the auger.

3. Place pan against the sampling point. Auger through the hole in the pan until the desired sampling depth is reached. Back off the auger and transfer the sample in the pan and adhering to the auger to a container. Spoon out the rest of the loosened sample with a sample trier.

1.2.1.7 Scoop and Shovel

Scope and Application

Scoops and shovels are used to sample granular or powdered material in bins, shallow containers and conveyor belts.

Apparatus

Scoops are available at laboratory supply houses. Flat-nosed shovels are available at hardware stores.

4 / SAMPLING - Implementation

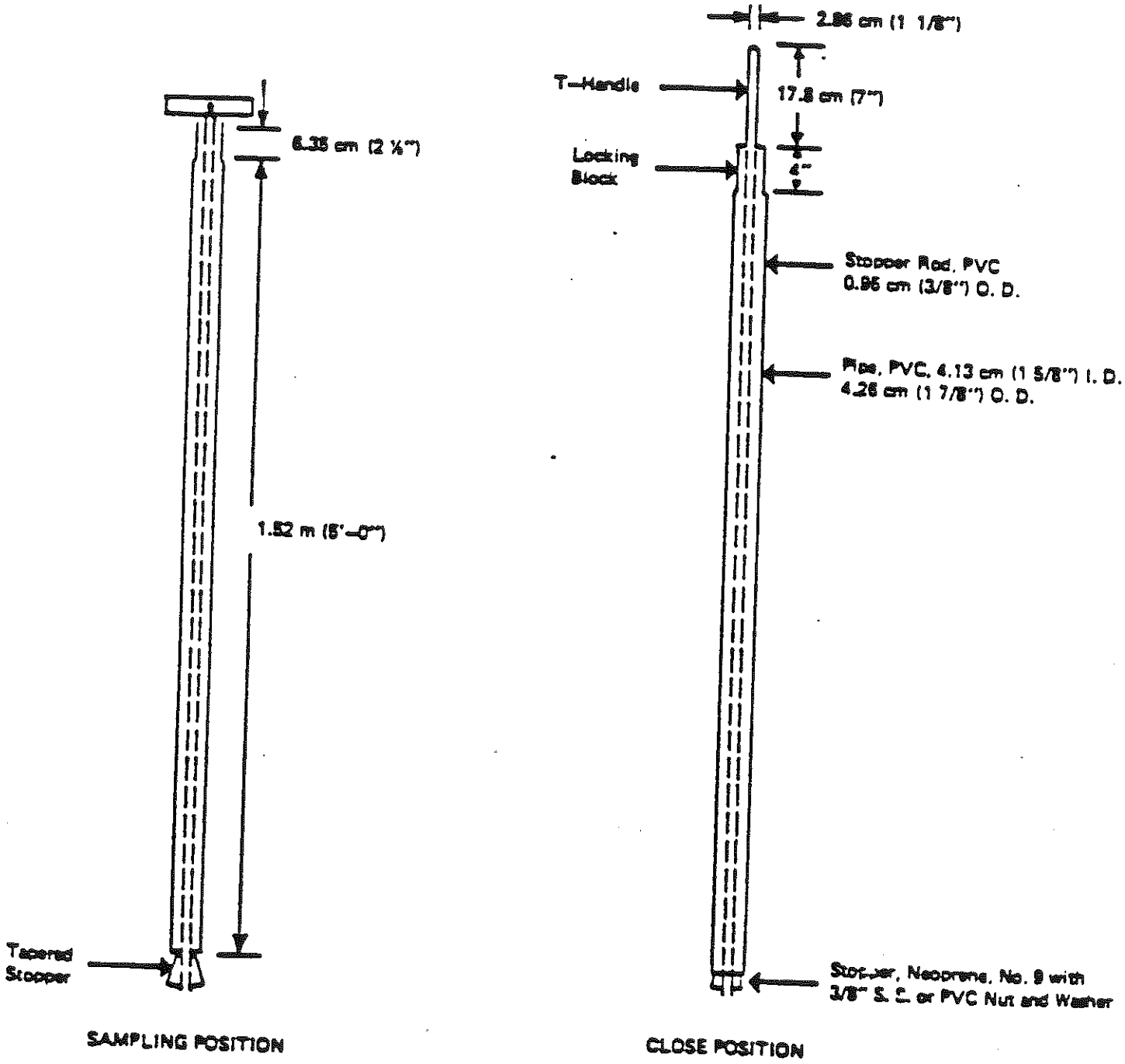


Figure 1. Composite liquid waste sampler (Coliwasa).

Procedure

1. Clean Coliwasa.

2. Adjust sampler's locking mechanism to ensure that the stopper provides a tight closure. Open sampler by placing stopper rod handle in the T-position and pushing the rod down until the handle sits against the sampler's locking block.

3. Slowly lower the sampler into the waste at a rate that permits the level of liquid inside and outside the sampler to remain the same. If the level of waste in the sampler tube is lower inside than outside, the sampling rate is too fast and will produce a nonrepresentative sample.

4. When the sampler hits the bottom of the waste container, push sampler tube down to close and lock the stopper by turning the T-handle until it is upright and one end rests on the locking block.

5. Withdraw Coliwasa from waste and wipe the outside with a disposable cloth or rag.

1.2.1.2 Weighted Bottle

Scope and Application

This sampler consists of a glass or plastic bottle, sinker, stopper, and a line which is used to lower, raise, and open the bottle. The weighted bottle samples liquids and free-flowing slurries.

General Comments and Precautions

1. Do not use a nonfluorocarbon plastic bottle to sample wastes containing organic materials.

2. Do not use a glass bottle to sample wastes that contain hydrofluoric acid.

3. Before sampling, ensure that the waste will not corrode the sinker, bottle holder, or line.

Apparatus

A weighted bottle with line is built to the specifications in ASTM Methods D 270 and E 300. Figure 2 shows the configuration of a weighted bottle sampler.

10 / SAMPLING - Implementation

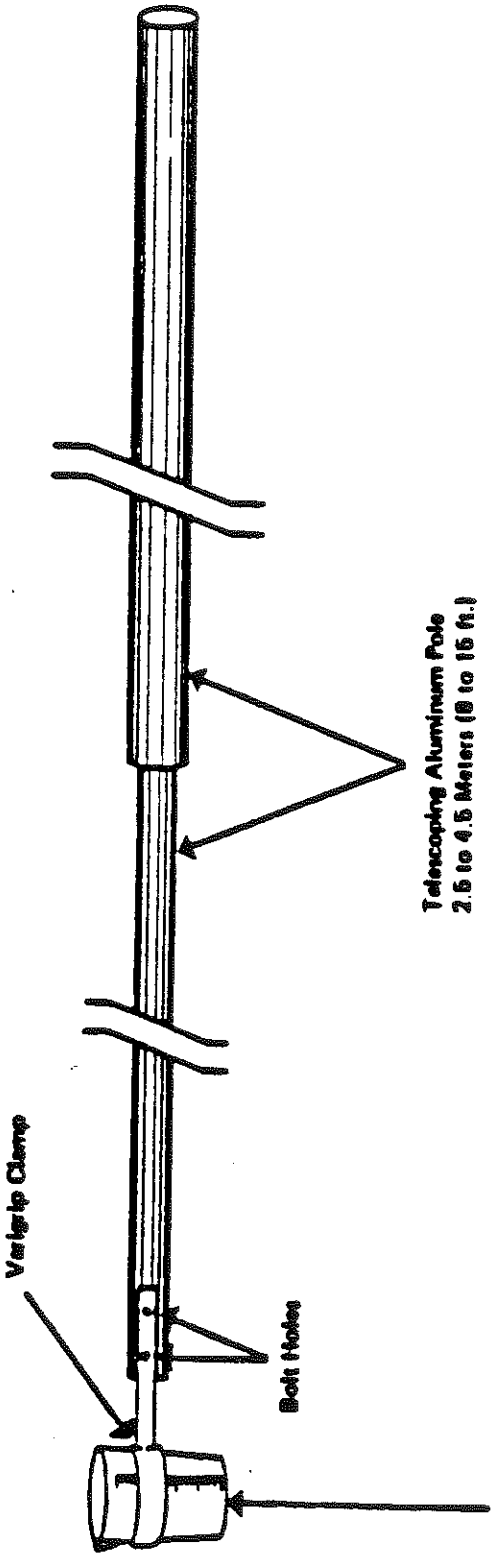


Figure 3. Dipper.

Procedure

1. Clean bottle.
2. Assemble weighted bottle sampler.
3. Lower the sampler to directed depth and pull out the bottle stopper by jerking the line.
4. Allow bottle to fill completely as evidenced by cessation of air bubbles.
5. Raise sampler, cap, and wipe off with a disposable cloth. The bottle can serve as a sample container.

1.2.1.3 Dipper

Scope and Application

The dipper consists of a glass or plastic beaker clamped to the end of a 2- or 3-piece telescoping aluminum or fiberglass pole which serves as the handle. A dipper samples liquids and free-flowing slurries.

General Comments and Precautions

1. Do not use a nonfluorocarbon plastic beaker to sample wastes containing organic materials.
2. Do not use a glass beaker to sample wastes of high pH or wastes that contain hydrofluoric acid.
3. Paint aluminum pole and clamp with a 2-part epoxy or other chemical-resistant paint when sampling either alkaline or acidic wastes.

Apparatus

Dippers are not available commercially and must be fabricated to conform to the specifications detailed in Figure 3. Table 3 lists the parts required to fabricate a dipper.

Procedure

1. Clean beaker, clamp, and handle.
2. Assemble dipper by bolting adjustable clamp to the pole. Place beaker in clamp and fasten shut.
3. Turn dipper so the mouth of the beaker faces down and insert into waste material. Turn beaker right side up when dipper is at desired depth. Allow beaker to fill completely as shown by the cessation of air bubbles.
4. Raise dipper and transfer sample to container.

WASTE ANALYSIS PLAN

All waste shipped off site is determined by an inspection (consisting of a chemist and the hazardous waste coordinator) to be either possibly hazardous or definitely non-hazardous. The locations of the various waste streams were determined by interviews with all plant superintendents and determining all of the actual and possible waste dispositions from their respective areas of the plant.

1. The non-hazardous wastes are those known to either not be composed of toxic chemicals or not to have been in contact with any toxic material.

   eg. Wood Scrap
   Cardboard Scrap
   Etc.

2. All other items are considered to be possibly hazardous.

A typical representative sample is obtained from the area in which the waste is generated according to instructions from Stilson Labs and as described in "Waste Analysis Section" - Pg. 37 and 38. This sample is sent to Stilson Laboratories, Columbus, for evaluation. Stilson Labs evaluates the sample for the four criteria required by RCRA - EP Toxicity, Corrosivity, Ignitability and Reactivity according to the "Test Methods for the Evaluation of Solid Waste, Physical Chemical Methods," SW-846 - (see letter Pg. 38b). Disposition of the waste is then handled according to the determinates of either being hazardous, non-hazardous, liquid or solid.

Possible new waste streams due to new and/or additional product developments are determined by the particular engineer involved with the project. Preliminary samples of the new waste stream are analyzed and after the decision is made as to the method of disposal, the final disposition is implemented by the hazardous waste coordinator.

If waste streams change, an analysis is made by Stilson Laboratories in order to determine the proper disposal method, eg. incineration, landfill.

DATE: September 30, 1983
REVISION NO: 3

TABLE I

HAZARDOUS WASTE PARAMETERS AND RATIONALE

Waste	Parameters	Rationale
Still Bottoms (Solid & Liquid)	Ignitability E.P. Toxicity - Pb & Cd	This is a listed waste (F005), exhibiting ignitability and toxicity Pb and Cd.
Dust Stop Waste	EP Toxicity - Cadmium	Past alalyses have identified only cadmium as exceeding EP toxic limits (D006).
Electroplating Sludge	EP Toxicity - Chromium	This is a listed waste - F006, chromium contaminated. No cyanides or reactive wastes are involved.
*Waste methylene chloride, 1, 1, 1 - trichloroethane	When generated: Methylene chloride 1, 1, 1 trichloroethane	This is a listed waste (F002).
*Waste cyclohexanone	When generated: cyclohexanone	This is a listed waste (F003).

*Although these wastes have not been generated, the potential for future generation exists. If and when they are generated, the wastes will be tested for the parameters as listed.

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT III
Inspection Plan

Columbus Coated Fabrics
1280 North Grant Street
Columbus, Ohio

U.S. EPA ID #: OHD 004-294-351

(5) Inspection Schedules

(i) The foreman in charge of the still recycling walks the area surrounding the still and also checks inside the hazardous waste storage building and the surrounding area. The foreman in charge of the loading dock area checks that specific area. These inspections are conducted as per the inspection schedule in Table II, Pg. 47, with the frequency as indicated. This inspection schedule will be kept at the facility.

Figure 8, Pg. 47a, is a daily inspection log providing a record of the inspector's specific observations as per the inspection schedule, Table II (pg. 47) and the remedial action taken, if required, including the date of such action.

Figure 8a, Pg. 47b, is a hazardous waste drum inventory sheet on which the inspector indicates the actual daily inventory of the number and type of hazardous waste drums in storage. This sheet also lists the date drums were shipped to the disposer and indicates in the remarks column the name of the disposer to which the drums were shipped.

(a) General Inspection Requirements

The Columbus Coated Fabrics Company inspects the hazardous waste storage area in order to discover any equipment malfunction, operator errors, or discharges that would cause or lead to the release of hazardous waste.

(b) The inspections are conducted for the specific purpose of:

(1) Determining if there are any leaks in the hazardous waste storage drums. If a problem is found, the foreman immediately notifies the proper persons to either fix the leak in the drum or transfer the material to a second drum.

(2) Checking the availability and soundness of safety and emergency equipment.

(3) Checking on operating equipment.

(4) Checking on security equipment.

(ii) Remedial Action

If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occured during the course of an inspection or anytime between inspections, remedial action will be taken immediately. Columbus Coated Fabrics personnel will notify the appropriate authorities per the Contingency Plan and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Refer to the Contingency Plan for further details.

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Safety & emergency equipment	Sand	Out of Stock	Weekly/as needed
	Portable sump pump	Availability; functional	Weekly
	Telephone	Functional	Daily
	Fire Hose	Leaks; water pressure	Daily
	Sprinkler system	Leaks; water pressure	Daily
	Emergency shower	Leaks; functional; water pressure	Weekly
	First aid equipment and supplies	Items out of stock	Weekly
Security devices	Facility fence	Damage to chain link structure	Weekly
	Container storage bldg. door	Damage to structure	Daily
Operating and structural equipment	Solvent still and related equipment	Sump freeboard; leaks in system	Daily
Container storage area	Container placement and stacking	Unobstructed aisle space; height of stacks; segregation of waste types	Daily
	Sealing of containers	Drums without lids; loose lids	Daily
	Labeling of containers	Improper identification	Daily
	Containers	Corrosion; leakage; structural defects	Daily
	Pallets	Damaged	Daily
	Base or foundation, ramp	Severe cracks or deterioration; settling	Daily
	Sump area	Debris; deterioration	Daily
	Warning signs	Damaged; obstructed	Daily
	Waste storage bldg.	Roof, window integrity	Daily
	General waste storage area	Debris; unlabeled drums; drums out of place; obstructions to normal drum handling	Daily
	Brass or bronze tools	Availability; functional	Daily
Loading/unloading dock	Spill control sand	Out of stock	Weekly
	Obstructions to drum handling	Debris; standing obstructions, snow, ice, wet or oily surfaces	Daily
	Barrel truck	Functional	Weekly

DATE: May 6, 1983
REVISION NO: 0

FIGURE 8

DATE: May 6, 1983
REVISION NO: 1

INSPECTION LOG

MONTH_____ YEAR_____

DATE	TIME	INSPECTORS NAME	OBSERVATIONS MADE	REPAIRS COMPLETED-REMARKS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				

HAZARDOUS WASTE STORAGE
IN 55 GALLON DRUMS - SOI

DATE: May 6, 1983
REVISION NO: 1

MONTH OF Aug 1982

FIGURE 8a

DATE	SHIPPED TO DISPOSER	WASTE SOLID & LIQUID PLACED IN STORAGE		TOTAL WASTE SOLID/LIQ. IN STORAGE — BY TYPE		NET TOTAL IN STORAGE	REMARKS	Leak Test
		*F005	+D006 & D007	*F005	+D006 & D007			
1							Sat Sun	
2		80	—	60		-0		
3		64		76		160		
4		64		[illegible]		16[illegible]		
5	765	64		28		12	To Cecos	
6	76						E Ross	
7							Saturday	
8							Sunday	
9		4		40		—		
10				2				
11		8		60		4[illegible]		
12		6		72		[illegible]		
13		8		80		88		
14		—		—			Saturday	
15		—		—			Sunday	
16	[illegible]	8		8		16	To Cecos	
17		12		12		2[illegible]		
18		12		24		36		
19		12		25		[illegible]		
20		12		40		[illegible]		
21			Sat					
22			Sun					
23		12		44		56		
24		12		52		64		
25		12		10		[illegible]		
26		11		11		[illegible]		
27		16		88		104		
28			Sat					
29			Sun					
30	72	20		100 28		128	To Cecos	
31		20		28		48		

*F005 is waste from scrap ink-solvent recovery still.
+D006 and D007 is waste from calender area - dust stop oil residue.

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT IV
Personnel Training Plan

Columbus Coated Fabrics
1280 North Grant Street
Columbus, Ohio

U.S. EPA ID #: OHD 004-294-351

(12) Personnel Training

(i) Figure 9 shows the organization of personnel at the facility. Management responsibilities involving actual handling of the wastes are split between the Hazardous Waste Management Coordinator, the Production of Waste Coordinator, and the Transportation Coordinator. Maintenance personnel (i.e. electricians and mechanics) work in the waste handling area when required to fix a malfunctioning piece of equipment, but they do not handle wastes directly.

(ii) Relative to and in response to emergencies, communication and alarm systems; hazardous waste personnel are trained in the classroom and on the job (automatic waste feed cut-off systems and ground water contamination responses are not applicable to the hazardous waste handling at CCF).

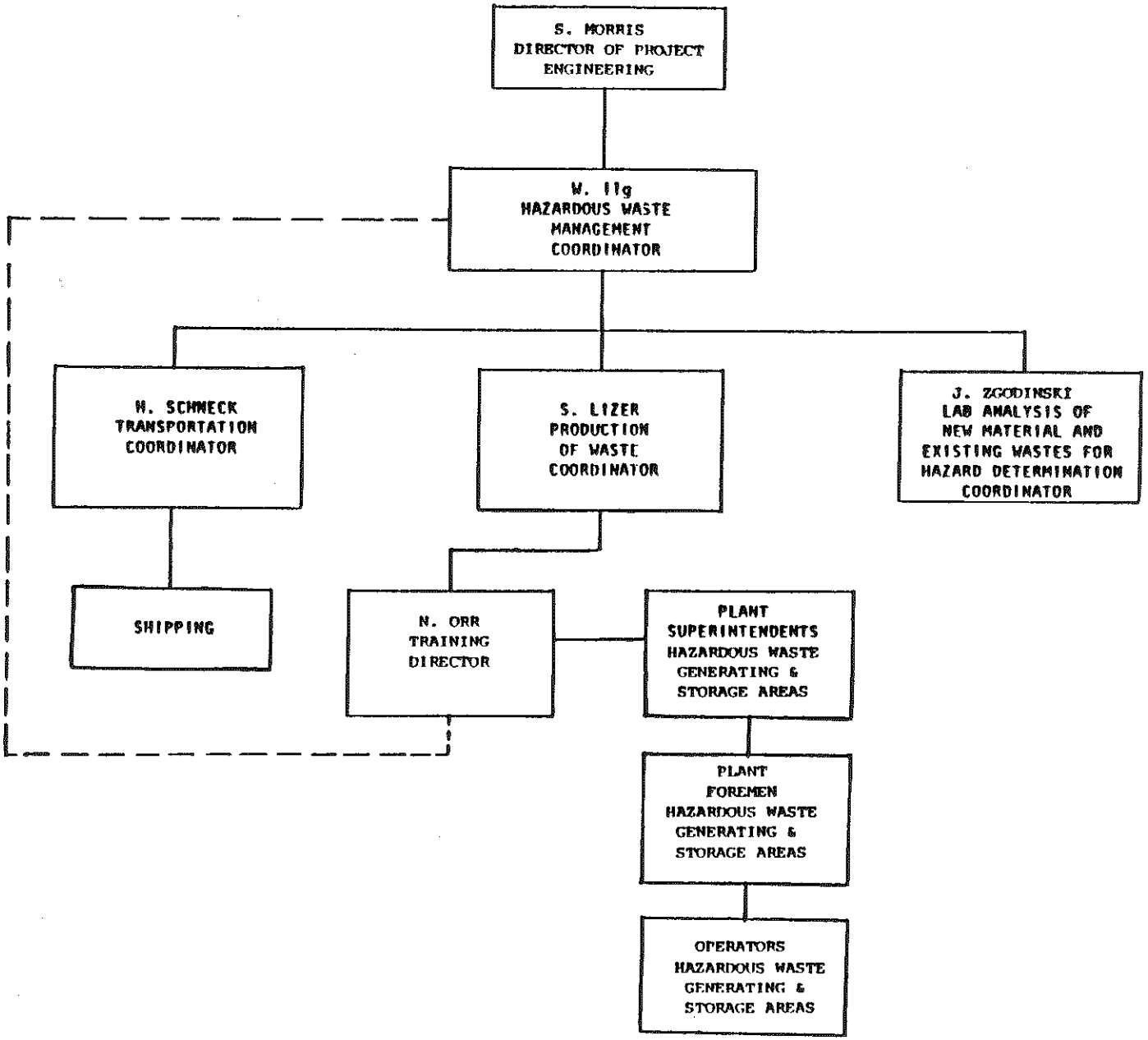
The safety director coordinates the training activity with the hazardous waste area foreman. The foreman oversees the training of the operators. The present operators assist the foreman in the training of new operators.

The safety director follows up in order to insure proper procedures are followed. Based on his observations, the safety director will change the training as he deems necessary.

(iii) The candidates for the positions described must have sufficient skills to fulfill the responsiblities listed.

(iv) The duties, responsibilities and qualifications of each position follow:

HAZARDOUS WASTE MANAGEMENT - CCF



DATE: February 4, 1983
REVISION NO: 1

FIGURE 9

DATE: February 4, 1983
Revision No: 1

Position Title: Hazardous Waste Management Coordinator

Name of Employee: William G. Ilg

Position Responsibilities and Duites:

- Coordinates all hazardous waste activities.
- Obtains all required permits and licenses or modifications of same from local, state, and Federal regulatory bodies.
- Resolves problems involving permits and licenses from local, state, and Federal regulatory agencies.
- Reports to Plant Engineer.
- Inspects plant grounds and all facilities for status of air, water, and solid/hazardous waste emissions and controls.
- Consults with maintenance foreman on questions involving emergency action.
- Drafts and submits all required reports to EPA or the State.
- Advises training director as to specific training details for hazardous waste handling.

Experience and Qualifications:

- Mechanical Engineering Degree.
- 2½ years experience in industrial pollution control management.
- Attended seminars on Hazardous Wastes Management and Control and DOT regulations concerning Hazardous wastes.
- Member of the Environmental Committee of the Chemical Fabrics & Film Association.

Position Title: Production Of Waste Coordinator

Name of Employee: Sam Lizer

Position Responsibilities and Duties:

- Overall operation and maintenance of the hazardous waste storage facility.
- Maintains facility compliance with RCRA and other permits.
- Oversees operators and reviews their performance in particular in the areas of:

  Operate materials/drum handling equipment safely and effectively. Handle leaks, spills, and emergency situations.

- Notifies plant environmental engineer, General Manager, and if so directed, proper authorities in emergency situations.
- Schedules all maintenance and repairs to structures and equipment for HWM facility.
- Is responsible for mechanic/electrician doing both scheduled and unscheduled maintenance and repair work to be sure he is not releasing hazardous wastes to the environment or contaminating himself.

Experience and Qualifications:

- 30 years experience in plant operation.
- Attended college for two years - majoring in Chemical Engineering.

DATE: February 4, 1983
REVISION NO: 0

Position Title: Safety Director

Name of Employee: Norman Orr

Position Responsibilities And Duties
(Pertaining to Hazardous Waste)

- Supervision of plant foremen in hazardous waste training.
- Maintaining training records of personnel handling hazardous waste.
- Makes periodic inspections and observations of hazardous waste handling.
- Follows up to insure proper procedures are being followed and discrepancies are corrected.

Experience and Qualifications

- B.S. Degree
- Attended Corporate Session on Overview of Hazardous Waste Regulations
- National Safety Academy Training Seminar

Date: September 30,1982
Revision No.: 0

Position Title: Foreman

Position Responsibilities:

- Reports to Superintendent
- Inspects tanks, drums, and other storage equipment, and any gauges, dials, and recorders as required for proper operation and structural integrity.
- Inspects drum storage area for evidence of leaks and spills and inappropriately placed drums.
- Inspects emergency equipment on a regular basis.
- Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.
- Makes appropriate entries into operating log, monitoring records, inspection records, and maintenance records, and files them according to established system.
- Notifies Superintendent and other plant authorities as necessary in emergency situations.
- Takes emergency action on own authority in accordance with established procedures.

Note: If applicant has no hazardous waste experience, special training in the functions and operation of a hazardous waste storage facility will be required before assuming job responsibilities. This training will be provided by Columbus Coated Fabrics.

Position Title: Operators

Position Responsibilities:

- Reports to area operations foreman.
- Operates waste handling equipment.
- Reviews all incoming wastes and assigns wastes to proper storage location.
- Reports malfunctions and problems with tanks, drums, and other storage equipment, and any gauges, dials, and recorders as required for proper operation and structural integrity.
- Reports any evidence of leaks and spills and inappropriately placed drums.
- Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.
- Makes appropriate entires into operating log.
- Notifies foreman and other plant authorities as necessary in emergency situations.
- Takes emergency action on own authority in accordance with established procedures.

ii. Following are copies of typical operating record sheets documenting the training of the involved personnel handling hazardous wastes.

Figure 10

DATE: February 4, 1983
Revision 1

TRAINING PROGRAM File — Solvent Recovery

	Name	Date	Instructor	Additional Remarks
1	Chester Hilliard	6-21-82	E.V. Burleson	
2	Brian Andrews	6-21-82	J. Horne	
3				
4				
5				
6				
7				
8				

AN UP-Date of TRAINING every six mont

1.				
2				
3.				
4				
5				
6				
7				
8				

Figure 11

DATE: February 4, 1983
REVISION NO. 1

HAZARDOUS WASTE HANDLING

PLASTIC PRE-MIX DUST STOP OIL

Removing oil and residue from banburys

Using proper containers for oils and residue

Using proper labels on containers

Storing full containers in designated areas

I have been instructed in the above procedures for handling of hazardous waste materials.

Signed: Employee [signature]

Instructor [signature]

Date: 7-26-82

(iii) Training in Hazardous Waste Handling is an element of the general training for the involved personnel.

(iv) Initial employee indoctrination by the Safety Manager concerning safety in the facility involves a discussion of Hazardous Wastes.

FORM 1022C

DATE: May 6, 1983
REVISION NO.: 0

INTER-COMPANY AND OFFICE CORRESPONDENCE

TO: WHOM IT MAY CONCERN

FROM: NORMAN ORR

LOCATED AT:

SUBJECT:

DATE: MAY 3, 1983

{ Dept. Branch Division Company

Included in the Hazardous Waste Handling training sessions, is an explanation of the chemicals, Lead, Chromium and Cadmium, that are present in waste products developed at Solvent Recovery and Calender Pre-Mix departments. Employees are informed that these chemicals are hazardous to their health under over exposed conditions. OSHA approved respirators are available and all employees are instructed on the proper use of safety equipment.

Norman Orr
Safety Manager

NLO/am

(v) All workers in the facility are thoroughly instructed in the handling of ignitable materials since any of the process materials have a lower ignitability temperature than the various types of hazardous wastes generated.

(a) No ignition sources are allowed in the facility except in designated areas.

(b) No smoking is allowed in entire facility other than in designated areas.

(c) No matches allowed in production areas.

(vi) All workers are instructed in the procedure to be followed in case of a fire and/or emergency.

(vii) All workers are instructed in the location of fire alarms and emergency escape routes.

(viii) The employees working in the Solvent Still area who handle the still bottoms in its liquid and solid form receive training in addition to the standard training given to all employees described in (v), (vi) and (vii) above. This additional training includes all of the following.

(a) The empty hazardous waste drums are placed in a pit at the unloading point for the still. Any spillage encountered in the filling of the drum is therefore contained in the pit.

(b) The still bottoms solid and/or liquid from one batch which normally fill 4 to 5 55 gallon drums are then scraped out of the still into the standard #17E Hazardous Waste Orange Drums.

(c) Any of the solid sludge that has spilled into the pit is manually shovelled into the hazardous waste drums containing the solid form of the waste.

(d) The operator fills the solid waste drums to within 4" to 6" of the top. Any liquid rising to the surface is dipped out into a hazardous waste drum containing still bottom liquid.

(e) The solid waste drum is then checked by means of the Solids Test described on Pg. 37 - (iv). If the check shows any free liquid, adsorbent material and/or ashes are added and mixed until the test indicates the material has met the solid criteria as per the test.

(f) After the solid waste drum has passed the previously described test, the last 4" to 6" of this drum is filled to within 1" of the top with ashes. The last 1" is filled with an adsorbent material such as "floor dry".

(g) The solid sludge drum is then sealed with a lid, gasket and locking ring.

(h) A hazardous waste sticker is placed on the drum stating "Flammable Solid".

(i) A second hazard waste sticker is attached describing the waste and the date the drum was filled with the signature of the operator.

(j) The solid waste drums are also stenciled with the CECOS Hazardous Waste Number (1271-A).

(k) Any liquid that is generated in the still process is placed in a separate liquid waste drum in the pit.

(l) Any of the liquid that has spilled into the pit is pumped into the liquid waste drum.

(m) As previously stated, any liquid from the solid drums is also placed in the liquid drums.

(n) The liquid drums are filled to the top - sealed with a lid, gasket and a locking ring.

(o) A label is affixed stating "Flammable Liquid".

(p) A second label applied to the drum stating the type of hazardous waste with the product waste code number, the date the drum was filled and the name of the operator filling the drum

(q) The liquid hazardous waste drums also are stenciled with the Ross Incineration Product Code (WPS 5485).

(r) After the solid and liquid hazardous waste drums are filled, they are pallatized and placed in the Hazardous Waste Storage Building by means of a fork lift truck.

(s) Any spills occurring on the concrete apron of the work area are contained and immediately cleaned up by the operator with sand and/or an adsorbent material. Any cleaning material used - such as rags, paper, towels, sand or floor dry, is placed into hazardous waste containers for proper disposal.

(t) Employees handling hazardous wastes in the still process are informed of the hazardous chemicals in the waste, i.e. cadmium and lead, and of the ignitability of the solid and liquid forms.

(ix) Employes working in the Banbury Dust Stop Oil and Residue Area:

(a) The oils and residue leaking at the Banbury dust stops are hazardous waste.

(b) This waste is hazardous since its cadmium content is in excess of 1 ppm. The waste is also ignitable (see employee training concerning ignitable material - Part (v) above).

(c) The operator on duty is responsible for the proper handling of this material in his/her working area.

(d) The oil and residue that leaks from the Banbury dust stops into troughs must occasionally be scraped by the operator into a container designed to catch material.

(e) When containers are full, the operator must dispose of the material into proper hazardous waste storage drums - 17E orange drums.

(f) These 55 gallon drums are stored in the Parker Street alley adjacent to the Banbury rooms.

(g) Operators will secure empty hazardous waste drums as required and position in Banbury rooms.

(h) After the flow pans are full, they are emptied into 55-gallon hazardous waste drums. The material is allowed to sit idle over night and the oil then is removed from the top of each drum and put into a separate hazardous waste liquid drum.

(i) When the solid and liquid drums are full, they are sealed, gasketed and a locking ring installed.

(j) The drums are tagged and stenciled with proper tags and EPA numbers, palletized and taken to the hazardous waste storage building for storage.

(k) The oil drums will have a "flammable liquid" label attached as well as a hazardous material label bearing the description of the waste, the date and the signature of the operator.

(l) The drums with residue will have a flammable solid label attached as well as a hazardous material label bearing the description of the waste, date and the name of the operator.

(m) Any spillage of hazardous waste is to be cleaned up immediately.

(n) Any cleaning materials, such as rags, paper towels and floor dry, used in cleaning up spillages must be put into hazardous waste containers for proper disposal.

(o) The drums of residue will have stencilled a CECOS Code Number 2471-C.

(p) The drums of oil are shipped to SYSTECH with a Systech Waste Number of STC-14-2007.

(x) Employees handling hazardous wastes in both these areas are furnished with work uniforms.

(a) If uniforms, due to a spill, become grossly contaminated, they are disposed of as a hazardous waste.

(xi) Plating Sump Area

(a) No CCF personnel directly handle this waste. Hazardous Waste Contractor removes the waste from the pit with a suction hose into a tank truck.

(xii) Implementation of Training Program

All current waste-handling personnel have been fully trained at the time of this submittal. In the future

all new personnel will complete this training program within 6 months of assignment to the hazardous waste storage facility or within 6 months of their date of employment, whichever is later. No employee hired to work at this facility will work unsupervised prior to completion of the training program.

Employees are required to meet twice per year for review and update of this training program. Furthermore, the following subjects will be discussed and studied:

(a) All hazardous wastes currently being handled at the facility, noting any changes in waste type, volume, source, characteristics, or location that have occurred during the past year.

(b) The status of storage and operating conditions and procedures, noting any areas where there are problems or potential for problems. Employees participate in developing effective solutions.

(c) The requirements contained in the facility's RCRA permit, noting any changes that have occurred during the past year. Areas where maintenance of compliance is a problem are identified and discussed, and effective solutions are sought.

(d) Incidents that have occurred in the past year that warranted use of contingency plans and/or emergency action. This review focuses on the cause of the incident and identification of steps to be taken to prevent or to ensure better handling of such events in the future.

Records documenting the job title for each position,

job descriptions, names of employees, and completed training programs (both introductory and review) will be kept onsite in the safety director's office of CCF. These records will be kept until closure of the facility for current employees and for 3 years from the date of the individual employee's termination for former employees.

DATE: May 6, 1983
REVISION NO: 0

FORM 1022C

BORDEN

INTER-COMPANY AND OFFICE CORRESPONDENCE

TO: DISTRIBUTION

FROM: W. G. Ilg
R. L. Johnston

LOCATED AT: CCF

{ Dept. Branch Division Company

SUBJECT: SPECIFIC OPERATING PROCEDURES RELATIVE TO THE HANDLING AND PROCESSING OF HAZARDOUS WASTE DUST-STOP OILS

DATE: March 30, 1983

Dust-stop oil is residue generated by the Banbury mixing process. Dust-stop oil contains a heavy metal, namely Cadrium, which has been declared a hazardous waste and, consequently, comes under stringent EPA disposal statutes.

Therefore, the following handling, processing and containerization procedures shall be strictly adhered to without any deviation.

Job Classification Responsible - Banbury Operators

1. Two (2) 55 gallon special (orange colored) hazardous waste drums shall be placed in each Banbury room.

   a) One drum shall be used for dust-stop solid waste only.
   b) One drum shall be used for dust-stop oils only.

2. Both drums shall be filled to within one-half inch (1/2") of the top. The drum containing the solid waste shall be free of any oil by pumping; any remaining solution shall be topped off using floor dry and/or ashes. NOTE: It is essential that absolutely no solution be found floating on the top prior to sealing the drum.

3. The drum containing dust-stop oil only will be sealed, placed on a 4 drum pallet and delivered by Dept. #10 Material Handling personnel to the hazardous waste storage building for staging until sufficient drum quantities are accumulated for subsequent removal by licensed hazardous wastes concerns.

4. It is absolutely forbidden to temporarily stage or store empty, but used, part full or full drums of dust-stop waste anywhere in other than the Banbury rooms or the hazardous waste storage building.

W. G. Ilg
Environmental

R. L. Johnston
Standards Engineering

/db

DISTRIBUTION

M. P. Kuskowski
D. H. Bibb
A. Ferguson
M. Z. Spriggs
S. E. Lizer - Information
S. W. Morris - Information
N. L. Orr - Information

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT V
Contingency Plan

Columbus Coated Fabrics
1280 North Grant Street
Columbus, Ohio

U.S. EPA ID #: OHD 004-294-351

(7) Contingency Plan (Spill Prevention Control and Counter Measures Plan)

Columbus Coated Fabrics
Division of Borden Chemical
Borden Inc.

Facility is located at:

1280 North Grant Avenue
Columbus, Ohio 43201

The operations performed at this facility are:

1. Production of vinyl sheeting.
2. Coating of vinyl fabric and paper substrates.
3. Printing on vinyl and paper.
4. Electroplating operations.

The site plan showing the topography of the area, the adjacent land uses, and the adjacent land features is shown on Pg. #49a, Revision 0.

The structural features of the storage building are shown on a plan view - Pg. #49b, Revision 0 and a section view - Pg. #49c, Revision 0.

CONTINGENCY PLAN/SPCC

TABLE OF CONTENTS

DATE: September 30, 1983
REVISION: 1

SPCC (SPILL PREVENTION CONTROL & COUNTER MEASURES) PLAN - COLUMBUS PLANT

SECTION I - History of Pollution Incidents Occurring.

A. There have been no "Spills" resulting in pollution of public waters at Columbus Plant since January 1973.

SECTION II - Pollution Potential at Plant Site.

Area and building numbers noted in Section V - Building Plans

A. Total quantities of oil and other substances stored at facility.

INSIDE STORAGE

Area 4 - Bldg. 106 -- 5500 gallons "max." of latex in 55 gallon drums.

-- 1650 gallons of wetting agent in 55 gallon drums.

--- 550 gallons of defoamers in 55 gallon drums.

-- 9000 pounds of dry pigments in drums.

Area 5 - Bldgs. 95 & 23 -- *27,000 gallons of print ink in 55 gallon drums.

-- 300 gallons of Y-1 (reclaimed MEK) in wash tanks.

Area 6 - Bldg. 6 & Bldg. 15 -- 1000 gallons on NH_4OH (28%) (ammonia) in tank.

-- 12,500 gallons of inprocess water based latex coating materials - stored in 5 - 2500 gallon tanks.

-- 7500 gallons of inprocess Plastisol coating material stored in 3 - 2500 gallon tanks.

-- 10,800 gallons in inprocess PN Grinds (pigment and plasticizer) in 6 storage tanks.

-- 4800 cubic feet of clay, pigments and PVC Resin in bags.

-- 1600 gallons of various latex and PVC coating materials in 20 mixers.

Area 7 - Bldg. 93 -- 50,000 gallons of raw latex stored in 5 - 10,000 gallon tanks.

-- 10,000 gallons of inprocess water based latex coating material in a storage tank.

*NOTE: Revised February 24, 1982

Area 8 - Bldg. 33 - 2nd Floor -- 400,000 pounds PVC Resins in 50 Lb. bags.

Area 9 - Bldg. 38 - 2nd Floor -- 24,000 pounds PVC Resins in 50 Lb. bags.

-- 10 - 250 pound drums aluminum powder.

Area 10 - Bldg. 35 -- 7,300 gallons of clear vinyl coating material in 50 gallon drums.

-- 3,000 gallons of PVC based adhesive in 3 storage tanks.

-- 1,100 gallons of various PVC coating materials in 11 mixers.

Area 11 - Bldg. 35 -- 3,800 gallons of vinyl coating materials stored in 55 gallon drums.

-- 1,400 gallons of Plastisol coating material in mixers.

*Area 12 - Bldg. 37 -- 200,000 pounds PVC Resin stored in 50 pound bags.

Area 13 & 18 - Bldg. 38 - Lower Level -- 10-250-pound drums aluminum powder.

-- 4,000 pounds PVC Resin in 50 pound bags.

-- 162 drums of assorted raw materials, stabilizers, plasticizers, silicone rubber, acrylic resin and flexigard coatings.

Area 14 - Bldg. 33 - First Floor -- 4,000 gallons clear vinyl resin coating material stored in 55 gallon drums.

Area 15 - Bldg. 33 - First Floor -- 2,700 gallons water latex coating material stored in 55 gallon drums.

-- 2,700 gallons of plastisol coating materials stored in 55 gallon drums.

Area 16 - Bldg. 93 - First Floor -- 4,500 gallons water latex and plastisol coating materials stored in movable containers.

Area 19 - Bldg. 58 -- 4,300 gallons of various plastisol coating and clear vinyl resin coating stored in 55 gallon drums.

1,600 gallons of various plastisol coating in mixers.

Area 20 - Bldg. 85 -- Approximately 800,000 pounds of dry raw materials (pigments, clay, calcium carbonate, PVC resins) stored in fibre drums and bags.

* Note: Revised September 30, 1982

Area 21 - Bldg. 85 - 2nd Floor -- 3,600 pounds various plasticizers temporarily stored in inprocess weigh tanks.

-- 550 gallons of various liquid stabilizers stored in 55 gallon drums.

Area 22 - Bldg. 67 - 2nd Floor -- 1,800 pounds various plasticizers temporarily stored in inprocess weigh tanks.

Area 23 - Bldg. 67 - 2nd Floor -- 1,600 gallons liquid stabilizers and plasticizers stored in 55 gallon drums.

Area 24 - Bldg. 85 - 2nd Floor -- 1,800 pounds of various plasticizers temporarily stored in holding and mixing tank.

Area 25 - Bldg. 104 - 2nd Floor - 1,800 pounds of various plasticizers temporarily stored in holding and mixing tank.

-- 3,000 pounds of various pigments in fibre drums and bags.

Area 26 - Bldg. 109 - 2nd Floor - 1,800 pounds of various plasticizers temporarily stored in holding and mixing tank.

Area 27 - Bldg. 109 - 2nd Floor - 50,000 pounds of clay and calcium carbonate stored in bags.

Area 28 - Bldg. 109 - 2nd Floor - 10,000 pounds of various pigments in fibre drums and bags.

Area 30 - Bldg. 101 -- The following is list of miscellaneous items stored and used in Plating operation.

1. 80 Gallons Aerodet heavy duty cleaner.
2. 95 Gallons muriatic acid.
3. 26 Gallons Sulfuric acid.
4. 500 Pounds Chromic acid.
5. 400 Pounds Copper Sulfate.
6. 35 Pounds Copper Cyanide.
7. 50 Pounds Potassium Cyanide.
8. 150 Pounds Sodium Hydroxide.
9. 100 Gallons Anode cleaner (contains 100 Pounds Sodium Hydroxide/50 Pounds Rochelle Salt.)
10. 65 Gallons Methylene Chloride.

Area 30
(Cont.) -- 11. 55 Gallons Naptha

12. 30 Gallons rust & corrosion preventive.

13. 20 Gallons degreaser.

14. 55 Gallons cold stripper

15. 145 Gallons Globrite 200 (contains muriatic acid).

16. 40 Gallons paint stripper.

17. 135 Gallons oil.

The following is list of plating baths and quantities.

1. 450 gallon - copper plating bath - mixture of water, copper sulfate and sulfuric acid. (CP-19)

2. 370 gallon - copper plating bath - mixture of water, copper sulfate and sulfuric acid. (CP-20)

3. 378 gallon - chrome plating bath - mixture of water, chromic acid and sulfuric acid. (CP-2)

4. 388 gallon - chrome plating bath - mixture of water, chromic acid and sulfuric acid. (CP-23)

5. 245 gallon - cyanide treating bath - mixture of water, copper cyanide, potassium cyanide and sodium hydroxide. (CP-21)

*Area 31 - Bldg. #37 & 59 - Solvent Still Area & Hazardous Waste Storage

1. Approx. 130 drums ink on hand awaiting recovery.

2. Approx. 30 drums partially filled - scrap resins and plasticizers awaiting filling with still bottom sludge for landfill disposal.

3. Maximum of 450 drums in storage awaiting shipment to disposer in addition to drummed and bagged raw material storage.

*NOTE: Revised September 30, 1982

OUTSIDE STORAGE

Tank #11 -- 10,000 gallons mineral spirits - UNDERGROUND

Tank #16 -- 6,100 gallons diesel fuel - ABOVE GROUND

Tank #17 -- 6,100 gallons diesel fuel - ABOVE GROUND

Unidentified -- 450 gallons kerosene fuel - UNDERGROUND

Tank #31 -- 10,000 gallons R595 (acetone) - UNDERGROUND

Tank #32 -- 10,000 gallons R551 (MIBK) - UNDERGROUND

Tank #33 -- 10,000 gallons R545 (MEK) - UNDERGROUND

Tank #34 -- 10,000 gallons R545 (MEK) - UNDERGROUND

Tank #35 -- 10,000 gallons Y-1 (scrap solvent) - UNDERGROUND

Tank #36 -- 10,000 gallons Y-1 (scrap solvent) - UNDERGROUND

Tank #37 -- 12,000 gallon -- OUT OF SERVICE - UNDERGROUND

Tank #38 -- 2,000 gallons Y-1 (scrap solvent) - UNDERGROUND

Tank #39 -- 2,000 gallons Y-1 (scrap solvent) - UNDERGROUND

Tank #40 -- 2,000 gallon - OUT OF SERVICE - UNDERGROUND

Tank #41 -- 2,000 gallons Y-1 (scrap solvent) - UNDERGROUND

Tank #42 -- 2,000 gallons Y-1 (scrap solvent) - UNDERGROUND

Tank #43 - 10,000 gallons R501 (Paraplex G-62) - ABOVE GROUND

Tank #44 -- 10,000 gallons R641 (DOP plasticizer) - ABOVE GROUND

Tank #45 -- 10,000 gallons R569 (ADMEX 746) - ABOVE GROUND

Tank #46 -- 10,000 gallons Y-1 (scrap solvent) - UNDERGROUND

Tank #47 -- 10,000 gallons R522 (tetrahydroforan) - UNDERGROUND

Tank #48 -- 10,000 gallons R545 (MEK) - UNDERGROUND

Tank #49 -- 12,000 gallons R545 (MEK) - UNDERGROUND

Tank #50 -- 10,000 gallon - OUT OF SERVICE - UNDERGROUND

Tank #51 -- 6,500 gallon R564 (mineral spirits) - UNDERGROUND

Tank #52 -- 6,500 gallons R507 (Toluol) - UNDERGROUND

Tank #53 -- 5,600 gallon - OUT OF SERVICE - UNDERGROUND

Tank #54 - 5,600 Gallon - OUT OF SERVICE - UNDERGROUND

Tank #55 -- 4,500 gallons R551 (MIBK) - UNDERGROUND

Tank #56 -- 4,500 gallons R554 (Xylol) - UNDERGROUND

Tank #57 -- 12,000 gallons R675 (Emery 9720 Plasticizer) - ABOVE GROUND

Tank #58 -- 12,000 gallons R582 (Santicizer 711) - ABOVE GROUND

Tank #59 -- 12,000 gallons R501 (Paraplex G-62) - ABOVE GROUND

Tank #60 -- 12,000 gallons R625 (Plastolein 9058 DOZ) - ABOVE GROUND

Tank #61 -- 12,000 gallons R657 (N-Octyl N-Decyl Adipate) - ABOVE GROUND

Tank #65 -- 10,000 gallons R680 (Admex 529) - ABOVE GROUND

Tank #66 -- 10,000 gallons R582 (Santicizer 711) - ABOVE GROUND

Tank #71 -- 5,000 gallons R670 (Di/So Decyl Phthalate) - ABOVE GROUND

Tank #72 -- 5,000 gallons R682 (DNOP) - ABOVE GROUND

Tank #73 -- 5,000 gallons R670 (Di/So Decyl Phthalate) - ABOVE GROUND

Tank #74 - 5,000 gallons R656 (Santicizer 160) - ABOVE GROUND

Tank #75 -- 10,000 gallons R582 (Santicizer 711) - ABOVE GROUND

Tank #76 -- 10,000 gallons R676 (Santicizer 141) - ABOVE GROUND

Tank #77 -- 2,000 gallons - NOT IN USE - ABOVE GROUND

Unidentified -- 600 gallons - gasoline - UNDERGROUND

Silo #1 -- 225,000 pounds R630 PVC Resin - ABOVE GROUND

Silo #2 -- 225,000 pounds R630 PVC Resin - ABOVE GROUND

Silo #3 -- 225,000 pounds R630 PVC Resin - ABOVE GROUND

Silo #4 -- 170,000 pounds R612 PVC Resin - ABOVE GROUND

Silo #5 -- 225,000 pounds R653 PVC Resin - ABOVE GROUND

Silo #6 -- 225,000 pounds R612 PVC Resin - ABOVE GROUND

Area 29 -- 16,500 gallons Liquid Stabilizers Stored in 55 gallon drums.

Unidentified -- 10,000 gallons - #2 Fuel Oil - UNDERGROUND *

*NOTE: Revised December 30, 1976.

B. Largest Potential Spill -- the greatest potential spill is from tanks numbered 43 to 45, 57 to 66 and 71 to 76. These liquids are all plasticizers which are not highly flammable but must be considered pollutants should the material get into the sewers. In the event of a spill, these tanks would drain and would be contained on the property due to land contour or drain to Parker Alley at a point which is approximately 350 feet from Fifth Avenue. The alley passes between buildings 85 and 86 and 104 for a length of 125 feet, which is a good location to build a temporary sand bag dike to block and contain a possible spill before it reaches Fifth Avenue.

A second greatest potential spill is from the tanks numbered 16 and 17 containing 6,100 gallons of diesel fuel each. These tanks are completely diked to contain the total contents of both tanks.

A third greatest potential spill is from the inside bulk raw latex storage and inprocess latex storage tanks. Spills from these tanks can be contained within the building. If spills are large enough to reach a floor drain, the floor drain can be blocked by using bags of clay or scrap cloth that is available.

C. POTENTIAL CAUSES OF SPILLS

1. Employee negligence - inaccurate inventory and filling tanks to overflowing condition, knocking over drums or puncturing drums, allowing liquids to discharge onto ground and eventually drain into combination storm and sanitary sewer.
2. High winds, tornadoes, explosions, earthquakes, or equipment failure, etc. could cause rupture of tanks or pipe lines allowing liquid to eventually drain into combination storm and sanitary sewer.
3. Acts of vandalism - tanks could be ruptured maliciously or liquids ·uld be dumped onto the ground into sewer manholes or drains.

SECTION III - SPILL PREVENTION AND CONTAINMENT

A. Exterior Storage.

1. Tanks -- Diesel Fuel tanks are diked with sufficient area and height to contain entire volume of tanks.

   Plasticizer Tanks 43 to 45, 57 to 66 and 71 to 76 are not adjacent to storm drains but they are near to Parker Alley which has a gradual slope toward Fifth Avenue. A plan has been developed to build a temporary sand bag dike across Parker Alley in the event of a spill, in order to contain the spill.

2. Tank Cars -- Tank cars of plasticizer and solvent are occasionally unloaded along east side of the property where natural contour of land would contain spill.

3. Tank Trucks -- Tank trucks are unloaded at two stations. Each of these areas represents a potential spill area that could eventually drain into the combination storm and sanitary sewers.

A plan has been developed for the unloading site at the north end of the facility which consists of the use of a cover plate and sand bags over a sewer opening. In the event of a spill, it then can be contained by the land contour.

A separate plan has been developed for the unloading site at the south end of the facility which consists of installing a ramp at the exit of Parker Alley plus the use of sand bags to prevent a potential spill from reaching the sewer opening at Fifth Avenue.

B. Interior Storage.

The location of containers or mixers are mostly located in areas without floor drains. Spills from these containers would be small and could be contained inside the building.

*C. Plating Building (Area 30)

1. In the event of a rupture of one of the plating tanks (other than the cyanide tank):

   a. The drain into the sump is to be plugged and the liquid will drain into the underfloor trench. This will prevent eventual discharge into the sanitary sewer.

   b. Maintenance will be notified immediately in order to pump the liquid into drums for disposition as per RCRA regulations.

2. In the event of a rupture of the cyanide tank:

   a. The liquid will drain into the curbed area surrounding the tank (there is no drain within this curbed area).

   b. Maintenance will be called to pump the liquid contained in the curbed area into hazardous waste drums for disposition as per RCRA regulations.

D. Hazardous Waste Storage Building (Area 31)

1. Because fire is always a potential hazard in spills of flammable materials, possible sources of ignition have been eliminated. Vehicular traffic and hazardous work in the area will cease until the spill is contained and safety is restored.

   a. If spilled material is flammable, the fire brigade will maintain a watch while the spill is removed.

   b. The spill will be pumped with a portable pump from the sump in the storage building into type 17E Hazardous Waste Storage Drums (orange).

   c. The drums containing the spilled waste will be manifested out to the appropriate hazardous waste disposal facility.

(d) Any remaining areas on the floor of the building containing spilled liquid will be squeezed and soaked up with a floor dry type of absorbent and/or an absorbent type pillow.

2. Contaminated Water Generated as a Result of Fire Control

a. In the event of fire control where quantities of water generated in the storage area are sufficient to exceed the containment capacity - an emergency containment dike of sand and/or adsorbent pads would be placed across the concrete roadway leading away from the hazardous waste storage building.

b. Contained water will be analyzed to determine if contaminated.

c. If the contained water is contaminated, it will be drummed into type 17E hazardous waste storage drums (orange) by means of a portable pump and manifested out to the appropriate hazardous waste disposal facility.

3. Determination and identification of hazardous materials involved in an emergency.

a. If the spill is the result of a drum leak, then the leaking drum can be visually identified from the hazardous waste label affixed in order to determine the type of hazardous material involved.

4. If operating personnel notice any emergency, such as a spill, they will notify their foreman at once and take immediate steps to contain the emergency. If the emergency is a fire, the fire alarm in the area

(on exterior wall of Bldg. #36 - within 60 ft. of Hazardous Waste building door) will be activated which alerts the CCF emergency brigade and the City of Columbus Fire Department.

a. If the emergency is such that it cannot immediately be contained by the operators and foreman, one of the emergency coordinators will be notified by the foreman.

b. Norm Orr, Emergency Coordinator, or, in his absence, any of the alternate emergency coordinators listed on pages 63 and 64 shall immediately react to the notification of an emergency by proceeding at once to the location of the emergency.

c. They will assume authority for obtaining and directing the necessary equipment and personnel respectively in order to contain and eliminate the cause of the emergency. If the emergency is a spill, maintenance personnel are notified and dispatched with a portable pump to the emergency area.

d. The Emergency Coordinator will have the following resources in order to determine if the emergency situation presents a serious threat to human health inside and outside the facility.

   (1) Visual Inspection

   (2) On-site Analytical Capabilities

e. In response to a fire, explosion or release, the hazardous waste and solvent still activity will be ceased. These areas will be monitored by the solvent still operator for the unlikely occurrence of leaks, pressure build-ups, gas generation and ruptures in pipes or valves, as applicable.

When the emergency is under control and emergency equipment is decontaminated, renovated and returned to its proper location, the solvent still can be reactivated.

5. In the event of an emergency at the Hazardous Waste Storage building and area (such as a fire or a spill), the necessity for evacuation of any of the plant employees will be made on site by the Columbus Coated Fabrics Emergency Co-ordinator in coordination with the City of Columbus fire personnel. There would be no need to evacuate any residents, as there are none residing in any proximity to the Hazardous Waste area.

6. If a spill emergency is encountered outside of the storage building, there are three locations with emergency sand available that can be used to contain the spill. If, in the unlikely event that the spill is not contained at any of these locations, the only place it could go is the city storm sewer system. This would require no need for evacuation.

a. In the case of entry into the storm sewer system, the City of Columbus would be notified and the outfall would be monitored if necessary.

7. Any spills contained inside the Hazardous Waste storage building (the 6" high ramp will contain any such spill) will be pumped from the existing sump into Hazardous Waste drums. Any residual liquid on the floor will be squeegeed into the sump and also pumped into Hazardous Waste drums.

a. Any liquid from exterior spills caught in the sand diked areas will be pumped into Hazardous Waste drums. Shovels will be used to drum any spilled solids.

b. The Hazardous Waste drums will be sent to the appropriate licensed Hazardous Waste landfill.

8. All equipment used during emergency cleanup will be steam cleaned, if required, rinsed and placed in their respective storage areas; this will be done prior to the resumption of operations. Any contaminated wash waters collected from the cleaning will be drummed to Hazardous Waste drums and disposed of at a licensed disposal facility.

a. Any equipment, such as gloves, cloths, contaminated sand, absorbent pads, etc., which may be contaminated beyond the potential for cleaning will be collected, drummed and disposed of to a licensed disposal facility.

9. Spill Related Equipment Available

a. A portable pump for removal of spills from the sump inside the Hazardous Waste storage building or from emergency diked areas, is stored in the yard adjacent to the Hazardous Waste storage building.

b. Emergency sand is contained in drums at the Hazardous Waste Storage building, unloading dock and the location where the roadway leaves the fenced area.

c. Shovels for distribution of the emergency sand are stored in the vicinity of the drums containing the sand.

d. Squeegees are available in the area for cleaning residual liquids from the affected area.

E. Facility Drainage

All drainage from this facility drains into either a sanitary sewer system or into a separate storm sewer system.

F. Plant Security

All access to the facility is protected by security fence. There is a security guard service in attendance at all times with regular guard tours controlled by ADT security watch, at night, holidays, and weekends. The area surrounding the plant is fairly well lighted.

G. Characteristics and Potential Hazards of Wastes.

1. The following four pages (62b, 62c, 62d and 62c) contain the laboratory analyzed characteristics of the generated Hazardous Wastes.

2. Hazards associated with the Hazardous Wastes

   a. Heavy metals as per the following sheets (62b, 62c, 62d and 62e) and a minimum amount of solvent (3%) composed of mostly MEK (Methyl Ethyl Ketone) are contained in the stored Hazardous Wastes.

   b. Occasionally some raw materials, that could be declared a waste, contain flammable solvents.

   c. Other than the flammable wastes noted on the following four pages, there is:

      1) HCl gas would be a major combustion product from mostly the solvent still bottoms if burned.

      2) The Dust Stop Oil would generate, if burned, some heavy metals in the smoke.

3. There are no secondary hazards beyond those identified in 1. or 2. above.

4. Due to smoke generation and the possibility of heavy metals in the smoke, personnel involved with a fire would take precautionary measures such as wearing of smoke masks consistent with good fire fighting practice.

5. There are no incompatible materials as per letter pg. #62f.

DATE: November 21, 1983
REVISION NO: 0

STILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-4385

BORDEN INC.-COLS. COATED FABRICS
1280 N. GRANT AVE.
COLUMBUS, OHIO
BILL ILG

LAB NO. 112
JOB 82-5033-24
DATE REC. 12. 8

LOCATION COLLECTED BORDEN SOLVENT STILL BOTTOMS - SOLID FORM

PRESERVATIVES USED -

DATE COLLECTED - - - DEC. 2, 81

TIME COLLECTED - - - 0900

FIELD PH - - - - - -

DATE RECEIVED - - - DEC. 3, 81

TEST	VOL. (ML)	DILTN FACT.	RESULT	UNIT
IGNITABILITY			54 130	C/F
ARSENIC			<0.005	MG/L
BARIUM			1.5	MG/L
CADMIUM			<0.1	MG/L
CHROMIUM			0.7	MG/L
LEAD			7.9	MG/L
MERCURY			<0.0005	MG/L
SELENIUM			<0.005	MG/L
SILVER			<0.1	MG/L

PROJECT MANAGER

THOMAS A. FERRO

DATE: November 21, 1983
REVISION NO: 0

STILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-4385

BORDEN INC.-COLS. COATED FABRICS
1280 N. GRANT AVE.
COLUMBUS, OHIO
FILL ILG

LAB NO. 132
JOB 82-5033-26
DATE FEB. 18, 1

LOCATION COLLECTED CCF2U LIQ. STILL BOT.

PRESERVATIVES USED -

DATE COLLECTED - - - FEB. 1, 82

TIME COLLECTED - - - 0000

FIELD PH - - - - - -

DATE RECEIVED - - - FEB. 2, 82

TEST	VOL. (ML)	DILTN FACT.	RESULT	UNIT
CORROSIVITY				PH-SU
IGNITABILITY			<22 72	C/F
ARSENIC			<0.005	MG/L
BARIUM			<1.0	MG/L
CADMIUM			2.4	MG/L
CHROMIUM			0.22	MG/L
LEAD		10	14.0	MG/L
MERCURY				MG/L
SELENIUM			<0.005	MG/L
SILVER			<0.1	MG/L

PROJECT MANAGER _____
THOMAS D. FLIPPO

Stilson Laboratories, Inc.
Columbus and Cleveland, Ohio

ADDRESS REPLY TO: 170 E. HIGH ST. COLUMBUS, OHIO 43215
PHONE 614/228-4365

DATE: November 21, 1983
REVISION NO: 0

E.P. TOXICITY
40 CFR 261.24

Client: Borden, Inc.
Columbus Coated Fabrics
1280 Grant Avenue
Columbus, Ohio 43201
Attn: Bill Ilg

Lab Number 8459
Job Number 92-5033-19
Date Reported 12/3/80

Location Collected Borden-PC 3 DUST STOP OIL AND PLASTICIZER RESIDUE
Date Collected 11/19/80
Date Received 11/19/80

EPA Hazardous Waste No.	Contaminant	Result milligrams/liter	Maximum Concentration milligrams/liter
D004	Arsenic		5.0
D005	Barium	80.	100.0
D006	Cadmium	6.0	1.0
D007	Chromium	< .1	5.0
D008	Lead	2.2	5.0
D009	Mercury		0.2
D010	Selenium		1.0
D011	Silver		5.0
D012	Endrin		0.02
D013	Lindane		0.4
D014	Methoxychlor		10.0
D015	Toxaphene		0.5
D016	2,4-D		10.0
D017	2,4,5-TP Silvex		1.0

DATE: November 21, 198
REVISION NO: 0

STILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-4385

COLS. COATED FABRICS-BORDEN, INC
P.O. BOX 208
COLUMBUS, OHIO 43216
ACCOUNTS PAYABLE

LAB NO. 48
JOB 92-5033-24
DATE AUG. 31, 8

LOCATION COLLECTED LIMESTONE SUMP CCF-23

PRESERVATIVES USED -

DATE COLLECTED - - - JULY 27, 81

TIME COLLECTED - - - 0000

FIELD PH - - - - - -

DATE RECEIVED - - - AUG. 7, 81

TEST	VOL. (ML)	DILTN FACT.	RESULT	UNIT
ARSENIC			<0.005	MG/L
BARIUM			<1.0	MG/L
CADMIUM			<0.1	MG/L
CHROMIUM			11.6	MG/L
LEAD			<0.1	MG/L
MERCURY			<0.0005	MG/L
SELENIUM			<0.005	MG/L
SILVER			<0.1	MG/L

PROJECT MANAGER Thomas A. Fliffo

THOMAS A. FLIFFO

FORM 1022C

DATE: November 21, 1983
REVISION NO: 0

INTER-COMPANY AND OFFICE CORRESPONDENCE

TO: BILL ILG

FROM: RICHARD L. ABRAMS

LOCATED AT:

SUBJECT: HAZARDOUS WASTE WAREHOUSE

DATE: MAY 4, 1983

{ Dept
Branch
Division
Company

The raw materials and hazardous wastes stored in our hazardous waste building will not react chemically with one another. Some wastes are toxic in varying degrees, and some constitute a fire or fire-related explosion hazard, but none will react to form more toxic or more flammable products, or produce heat.

A system will be established, with the assistance of Manufacturing, to assure that no reactive combinations of materials will be stored in that building.

Richard L. Abrams

Richard L. Abrams, PhD
Director of Quality Assurance

RLA/js

cc: S. Lizer
C. J. Oshinski

SECTION IV - DEVELOPMENT OF A DISCHARGE CONTINGENCY PLAN TO BE FOLLOWED IN EVENT OF AN UNAVOIDABLE SPILL.

*A. Notification Procedure. (For additional information, see Pg. No. 64)

1. Columbus Coated Fabrics - Division of Borden Chemical
   a. N. L. Orr - Safety Director (Emergency Coordinator)
   b. S. E. Lizer - Plant Manager
   c. M. E. Hawse - Emergency Brigade Chief
   d. L. T. Poteet - Maintenance Superintendent
   e. S. W. Morris - Director of Project Engineering
   f. D. H. Bibb - Supervisor & Chief of the Emergency Squad

2. Borden Company
   a. Operation Alert - 614-457-5200

3. State Agencies
   a. Ohio EPA Emergency Response Number
      2244-46 South Hamilton Road
      Columbus, Ohio 43227
      466-6542
      Ask for Hazardous Waste Section, Debbie Unger
   b. Ohio EPA Emergency Spill
      466-8508
   c. Ohio EPA Emergency Response
      361 East Broad Street
      Columbus, Ohio 43216
      466-6542

4. Governmental Agency
   a. National Response Center
      800-424-8802

5. City of Columbus Emergency Aid
   a. Columbus Fire Department
      221-2345

      The Columbus Fire Department inspects the facility once a year and checks out emergency equipment.

   b. Columbus Emergency Squad
      221-2345

      The emergency squad takes injured to a hospital determined after arrival at the plant.

   c. Columbus Police Department
      462-4545

*Revised February 24, 1982

SECTION IV - DEVELOPMENT OF A DISCHARGE CONTINGENCY PLAN TO BE FOLLOWED IN EVENT OF AN UNAVOIDABLE SPILL.

*A. Notification Procedure.

1. Columbus Coated Fabrics - Division of Borden Chemical

a. M. L. Orr - Safety Director (Emergency Coordinator)
953 Pleasant Ridge Avenue
Columbus, Ohio 43209
Home non-responsive Office Phone - 225-6200

b. S. E. Lizer - Plant Manager
1745 Bob-O-Link Bend East
Columbus, Ohio 43229
Home [redacted] non-[redacted] Office Phone - 225-6274

c. M. E. Hawse - Superintendent
433 West Kanawha Avenue
Columbus, Ohio 43214
Home [redacted] non-[redacted] Office Phone - 225-6280

d. L. T. Poteet - Maintenance Superintendent
6827 Retton Road
Reynoldsburg, Ohio 43068
Home non-[redacted] [redacted] Office Phone - 225-6353

e. S. W. Morris - Director of Engineering
1069 Virginia Avenue
Columbus, Ohio 43212
Home non-[redacted] [redacted] Office Phone - 225-6320

f. D. H. Bibb - Supervisor & Chief of the Emergency Squad
3114 Reynoldsburg New Albany Road
New Albany, Ohio 43054
Home non-responsive Office Phone - 225-6223

*Added April 15, 1982

FORM 1822C

DATE: September 30, 1983
REVISION NO.: 2

INTER-COMPANY AND OFFICE CORRESPONDENCE

TO: WHOM IT MAY CONCERN

FROM: S. E. Lizer

LOCATED AT:

Dept.
Branch
Division
Company

SUBJECT:

DATE: 30 April 1983

Mr. Norman Orr, Safety Director of Columbus Coated Fabrics, located at Seventh and Grant Avenues, Columbus, Ohio, in his position as Emergency Coordinator, has the authority to use any needed resource to implement Emergency procedures for spill control, fire control, or any other incidents under the Contingency Plan.

In his absence, the alternate Emergency Coordinators listed have the same authority.

S. E. Lizer - Plant Manager
D. H. Bibb - Supervisor & Chief of the Emergency Squad
M. E. Hawse - Superintendent
L. T. Poteet - Superintendent of Maintenance
S. W. Morris - Director of Engineering.

S. E. Lizer
Plant Manager

Distribution:

D. H. Bibb
M. E. Hawse
W. G. Ilg (3)
S. W. Morris
T. J. Ness
N. L. Orr
L. T. Poteet

B. Containment of Spill.

1. Equipment on Hand -- loose sand and sand in bags. Oil absorbent material and portable pumps. Cover plate.

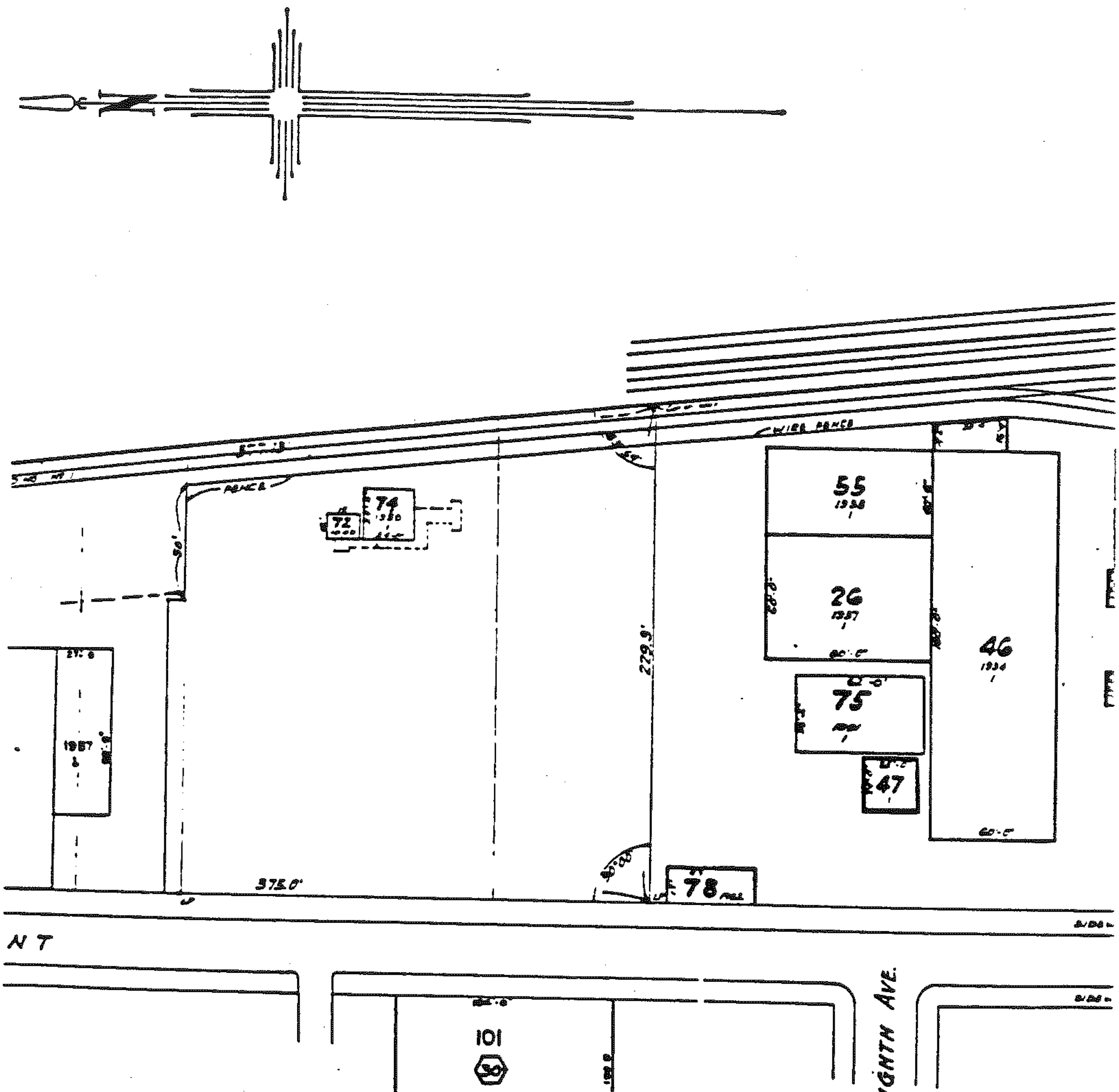
2. Temporary dikes can be built from sandbags, loose sand or oil absorbent material in the event of a spill. Maintenance men would pump contained spills into 55 gallon drums and use absorbent materials in final clean-up.

*SECTION V - BUILDING PLANS (Pg. 67 thru Pg. 67d)

Prepared by S. W. Morris, Director of Project Engineering

*Added February 24, 1982

DATE: September 30, 198
REVISION NO. 2



DESIGNATIONS OF BUILDINGS.

1 - ONE STORY
2 - TWO STORY
3 - THREE STORY
B - BASEMENT

B.
...T STORAGE SHELF
...GE & OFFICE BUILDING
... THIRD COAT CALENDERS BUILDING
...E. RAW SHEETING CALENDER BUILDING.
...AKING BUILDING.

27 RESTAURANT.
OIL KETTLE BUILDING.
TRANSFORMER ROOM.
30 PIPE SHOP.
31 PRINTING BUILDING.
FACTORY OFFICE BUILDING.
STORAGE FX BUILDING.
34 EMBOSSING FX BUILDING.

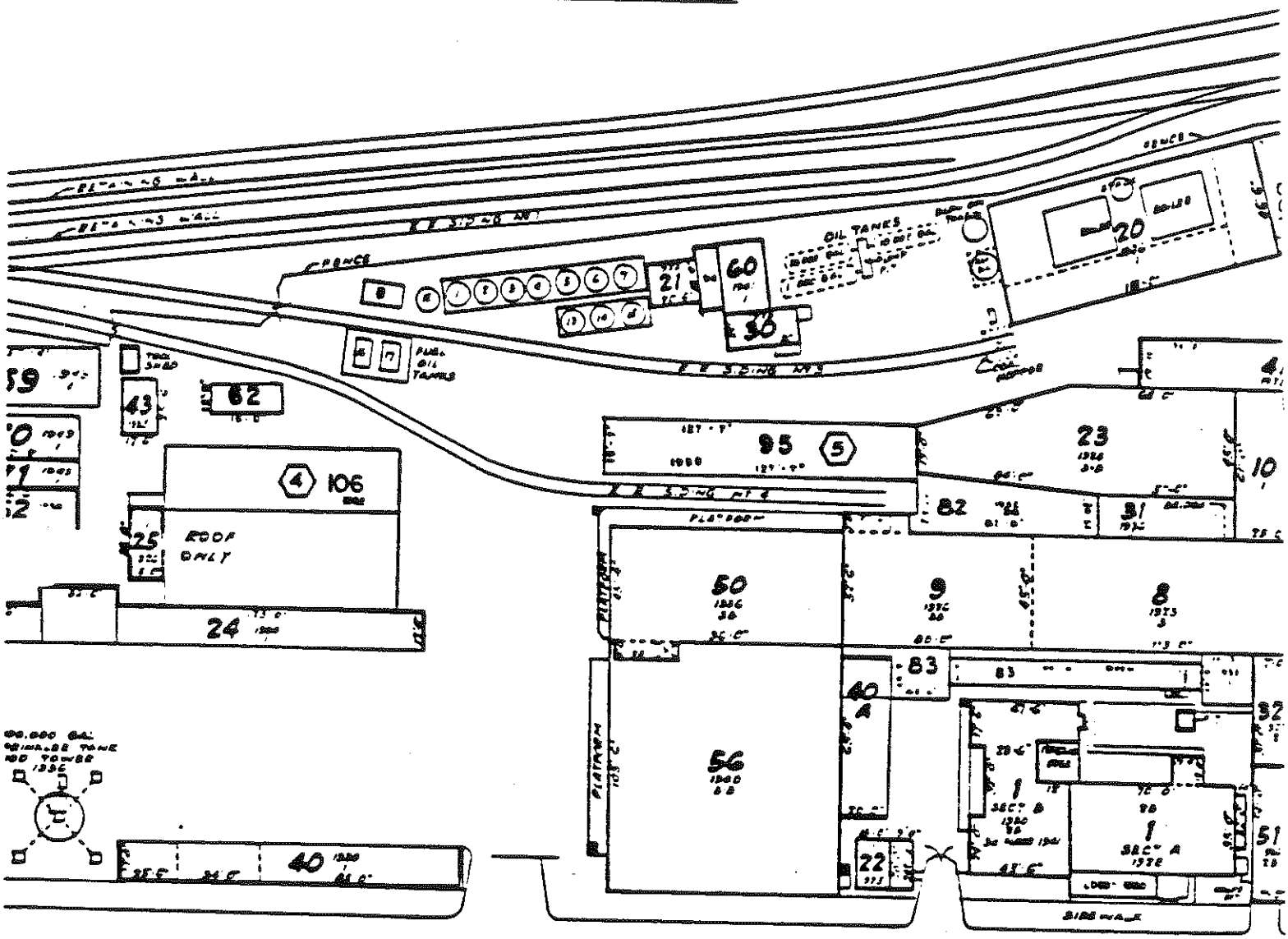
LABORATORY.
55 SAMPLE BUILDIN...
56 SHIPPING & NO...
57 EMBOSSING ROO...
58 MIXING ROOM
59 SOLVENT RECO...
60 PIPE SHOP AD...
61 TOILET
62 PAINT SHED.

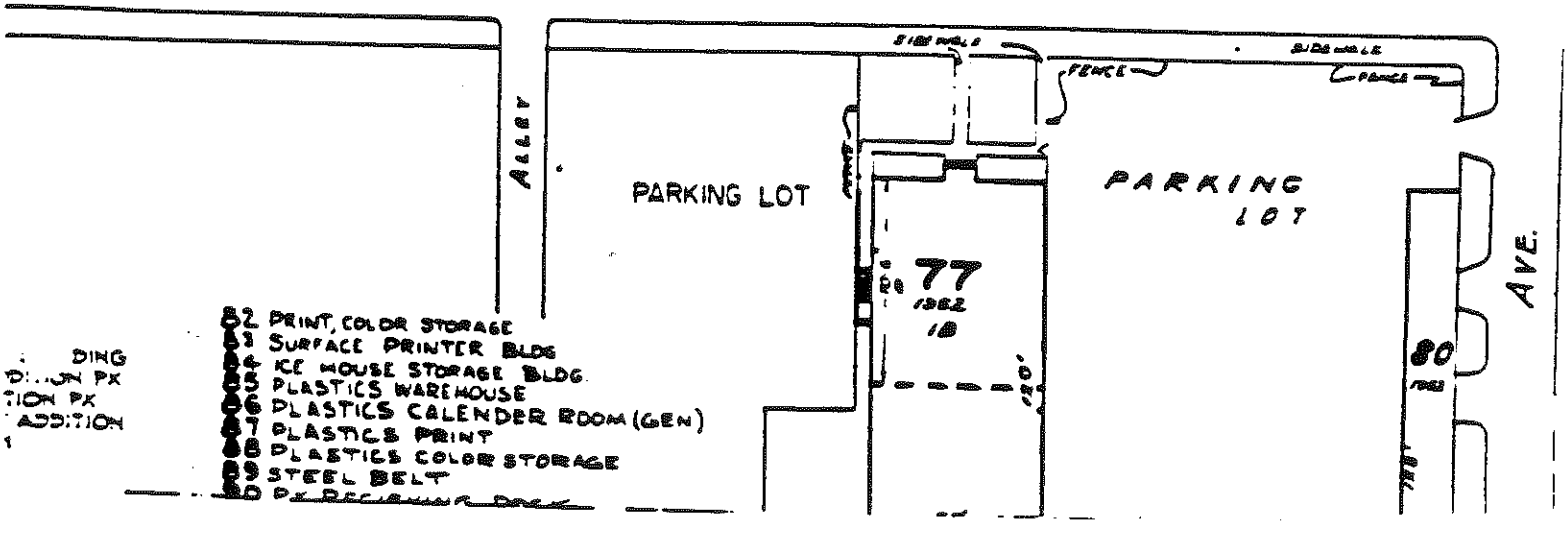
DATE: September 30, 1983
REVISION NO: 2

AREA NOTED IN ⬡

TOTAL ACREAGE = 16.25

GROUND FLOOR SPACE = 344,798 FT² = 7.89 ACRES.
SECOND " " = 73809 FT² = 1.69 "
THIRD " " = 33,222 FT² = 0.77 "
TOTAL " " = 448 829 FT² = 10.37 "



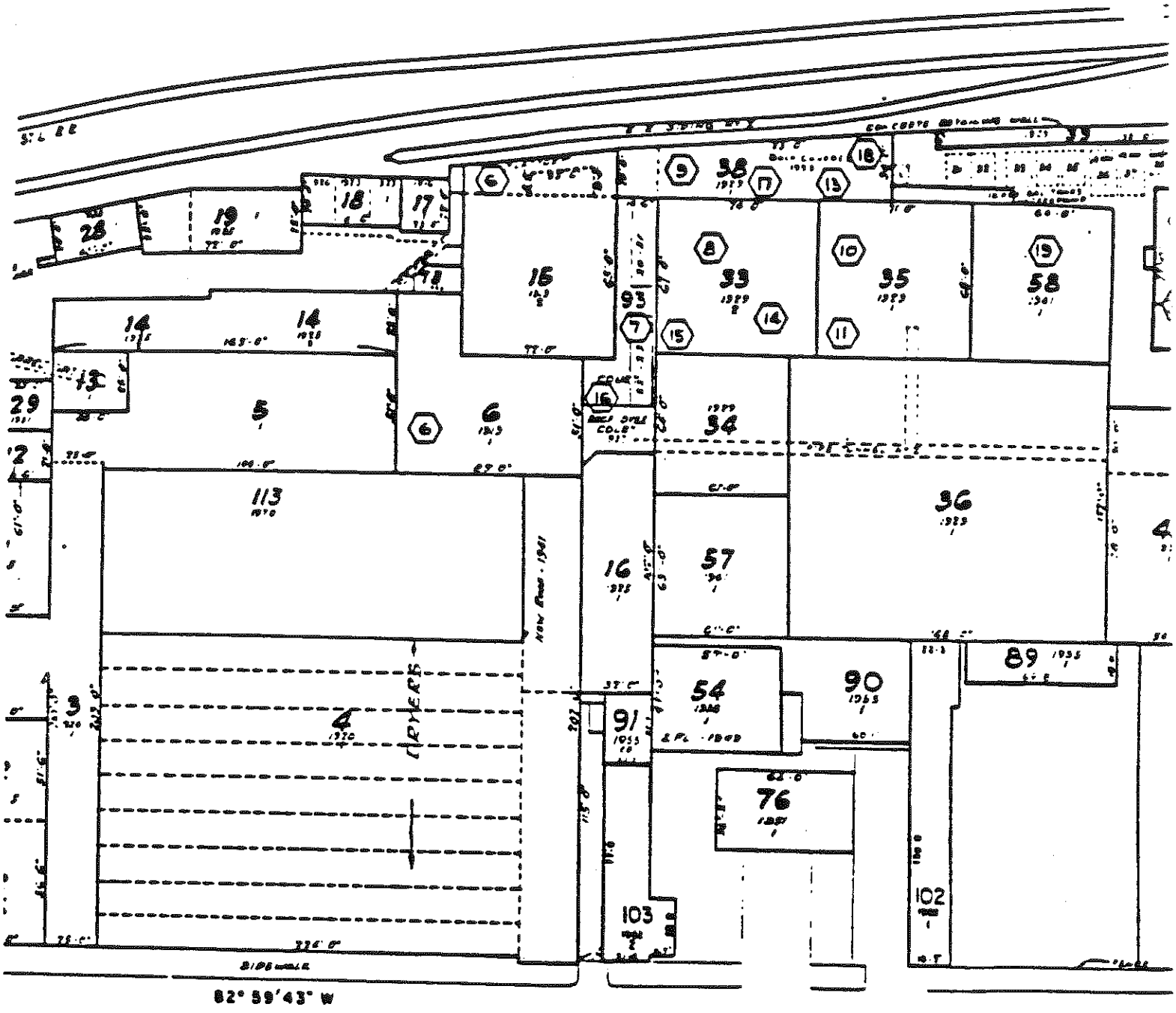


82 PRINT, COLOR STORAGE
83 SURFACE PRINTER BLDG
84 ICE HOUSE STORAGE BLDG.
85 PLASTICS WAREHOUSE
86 PLASTICS CALENDER ROOM (GEN)
87 PLASTICS PRINT
88 PLASTICS COLOR STORAGE
89 STEEL BELT
90 PK RECLAIMER DOCK

DING
DITION PX
TION PX
ADDITION

DATE: September 30, 1983
REVISION NO: 1

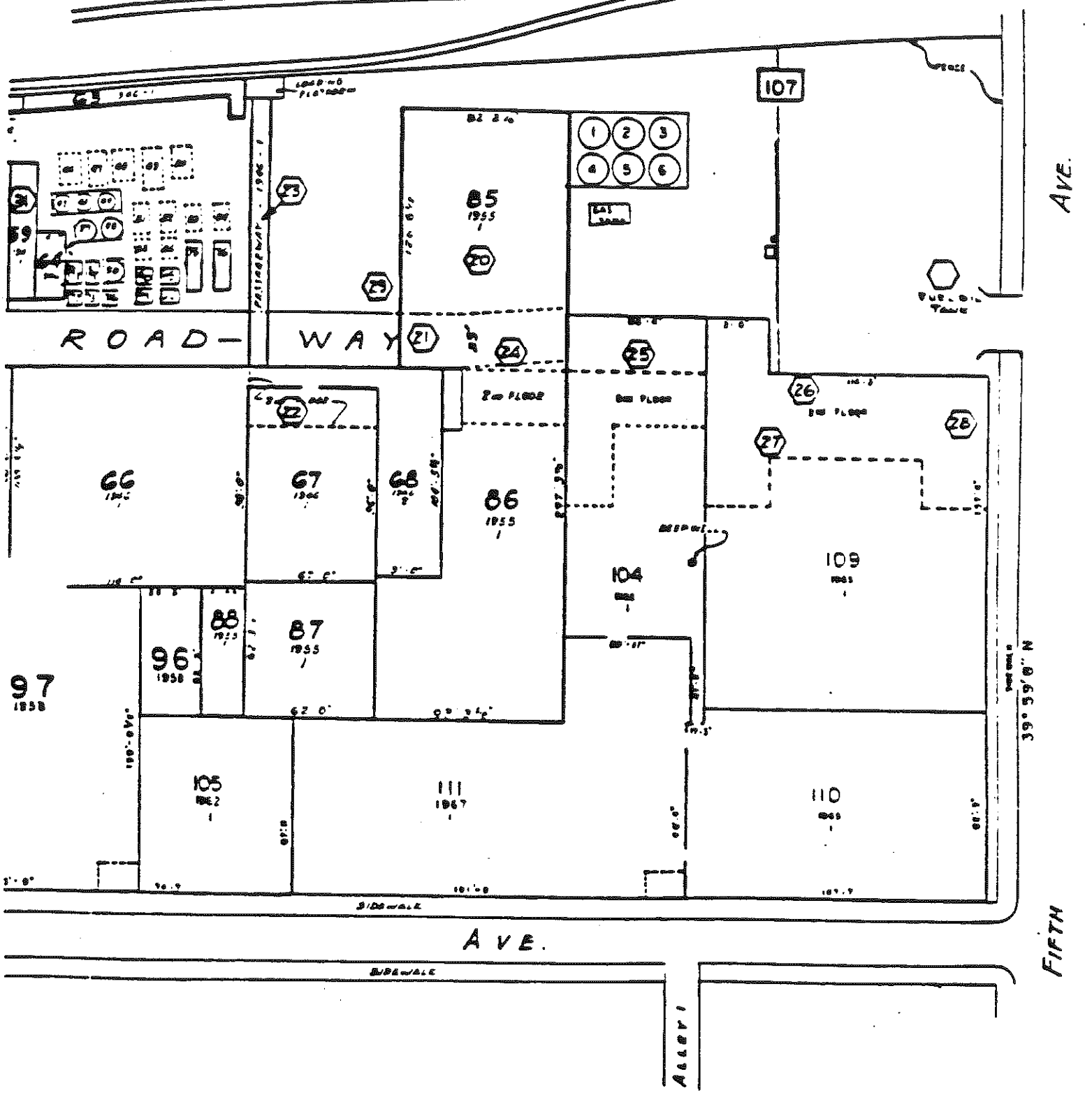
AREA NOTED IN ⬡



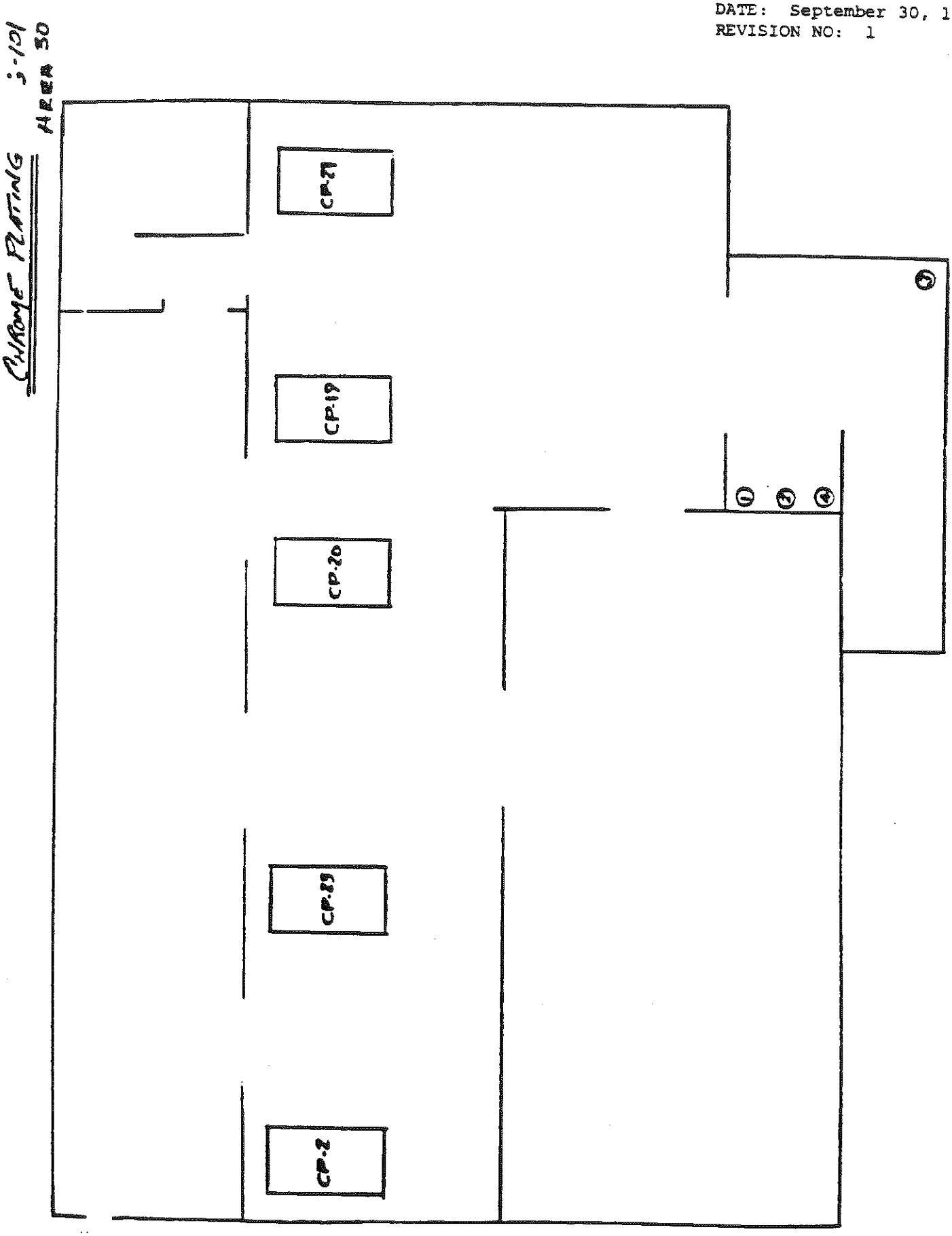
COLUMBUS COATED FABR

DATE: September 30, 1983
REVISION NO: 1

AREA NOTED IN



DATE: September 30, 1983
REVISION NO: 1



DATE: September , 1983
REVISION NO: 1

Safety Regulation
Date 7/20/84
Approved

VI. FIRE AND EXPLOSION EMERGENCY ACTION PLAN

Purpose

To ensure the safety of all employees in the event of a major fire and/or explosion, or other incident of major proportions.

Procedure

A. ON DUTY PERSONNEL ASSIGNMENTS:

In the event of a major fire and/or explosion, or other incident of major proportions in one of the manufacturing areas, the following basic assignments shall be carried out.

1. SHIFT SUPERINTENDENT

   a. The operating shift superintendent in the area of the disaster shall be in complete charge and direct the Emergency Brigade in fire fighting and emergency activities.

2. OPERATING FOREMEN

   a. Activate the area fire alarm, call Emergency Squad (dial 9-221-23) in case of personal injuries call First Aid (dial 6040 or 6058).

   b. Report disaster emergencies other than fire and explosion on the company public address system, dial 7 and report the type of emergency and the location of emergency. Repeat the announcement at least 2 times.

   c. Notify the main gate guard (call 6213) of the location of the emergency and the arrival of the Emergency Squad.

   d. Shall direct the shut down of necessary equipment to minimize danger and loss.

   e. Evacuate all personnel, not needed in the emergency, via the designated evacuation route, to the designated assembly area and account for all personnel that report to him.

   f. Contact departmental superintendent or request guard to do so.

3. EMERGENCY BRIGADE

   a. Immediately following the fire alarm or reporting of an emergency, members of the Emergency Brigade will report to the emergency area to execute orders under the direction of the ranking Brigade membe

   b. Members of the Emergency Brigade with special assignments shall proceed to their assigned posts and execute the special duties and

remain there until relieved by Brigade Chief unless otherwise instructed.

1. Sprinkler valves

2. Gate men

c. The Emergency Brigade will fight fires in the incipient stages only. Upon the arrival of the City Firemen and equipment, Emergency Brigade members shall be relieved of fire fighting duties.

d. The Emergency Brigade will assist in salvage and clean up duties and other assignments as directed by the operating foreman to minimize danger and loss.

e. A Brigade member shall be designated to meet emergency fire equipment at gate nearest to emergency area.

4. SHIFT MAINTENANCE FOREMAN

a. Immediately following the fire alarm or reporting of an emergency, shift maintenance supervisors shall report to the emergency area and direct the necessary maintenance activities.

1. In accordance with the pre-arranged plan:

Ensure an electrician is dispatched to man the fire pump.

Ensure a pipe fitter is dispatched to man the sprinkler valve controlling the fire area.

Shut off flammable gas and liquid systems in the emergency area.

5. SECURITY GUARDS

a. Guards will announce the arrival of City Fire Equipment and Emergency Squads and direct equipment to plant entrance nearest the emergency area.

b. Guards will permit only authorized personnel and emergency vehicles to enter the plant.

c. Guards, when authorized by supervision, will call persons as listed on the Emergency Call list.

d. Guards will remain at the phone in the Main Gate House to assure all areas receive the emergency call.

e. All media representatives shall be directed to the Personnel Manager.

B. ON ARRIVAL PERSONNEL OR DAY HOURS ASSIGNMENTS:

1. PLANT MANAGER/DEPARTMENTAL SUPERINTENDENTS

a. Assume direction of emergency activities.

2. SAFETY/SECURITY MANAGER

   a. Coordinate the loss control activities.

3. FIRST AID ATTENDANTS

   a. Direct all first aid activities.

   b. Keep records of casualties and disposition of injured employees.

4. PERSONNEL MANAGER

   a. Obtain authorization to coordinate arrangements for News Releases and Media inquiries.

   b. Ensure the notification of families of injured or hospitalized employees.

5. MAINTENANCE SUPERINTENDENT

   a. Ensure proper shut down of necessary equipment.

   b. Direct all emergency repair.

*C. AREA 31 (see Pg. 67b & 67c) - HAZARDOUS WASTE STORAGE - CONTROL PROCEDURES FOR FIRES

1. The entire Hazardous Waste Storage Building is separate from the main factory complex by a concrete roadway in the west side and a concreted area approximately 15 ft wide on the north side.
2. The Hazardous Waste Storage Building is protected from fire by a wet sprinkler system. The sprinkler system heads are located for a coverage in excess of "high hazard protection" (a maximum of 69 sq ft of floor space per sprinkler head).
3. In addition to the sprinkler system, a 1½ inch, 75 foot wall mounted fire hose reel is available connected to the internal fire system of the facility. This is located directly across the roadway

west of the Hazardous Waste Storage Building. This hose will reach to the center of the Storage Building.

4. The storage building is easily accessible for fire fighting vehicles and equipment for both City fire fighting equipment and the plant fire brigade. See Map Pg. 66a for Access Route. The fire brigade will fight any fire until outside assistance has arrived.
5. The following action will be taken in the storage area in the event of a fire:
   (1) Fire doors in adjacent area will be closed.
   (2) Hazardous work in the area will be shut down immediately.
   (3) All equipment in the area will be shut down, as necessary and practical.
   (4) The Emergency Coordinator will be contacted (see Page 59).
   (5) The area will be cleared of all personnel not actively involved in fighting the fire.
   (6) All injured persons will be removed, and medical treatment will be administered by qualified personnel.
6. The Emergency Coordinator will have the following resources in order to determine if the emergency situation presents a serious threat to human health inside and outside the facility.
   (1) Visual Inspection.
   (2) On-site Analytical Capabilities.
7. In response to a fire, explosion or release, the hazardous waste and solvent still activity will be ceased. These areas will be montiored by the solvent still operator for the unlikely occurrence of leaks, pressure build-ups, gas generation and ruptures in pipes or valves, as applicable.

   When the emergency is under control and emergency equipment is de-contaminated, renovated and returned to its proper location, the solvent still can be reactivated.

VII EMERGENCY EQUIPMENT

The following list (Pg. 71b) details the Emergency Equipment used in the event of a Hazardous Waste Emergency. Also included is the location of the equipment with a description of the item and its capabilities. This list will be revised in the event of additions or deletions to the Hazardous Waste emergency equipment inventory.

Additional information on spill related emergency equipment can be found on Pg. #62.

When the emergency equipment is utilized, it will be decontaminated and renovated prior to the resumption of Hazardous Waste Storage operations.

VII EMERGENCY EQUIPMENT

ITEM	LOCATION	DESCRIPTION/CAPABILITIES
Sand	.Drum storage building .End of loading dock .End of Parker Street	Dry sand for the control of spills
Shovel	.Drum storage building .End of Parker Street	Handling of sand and contaminate solids
Portable Sump Pumps	.Maintenance storage area	Electric pumps for movement of spilled liquids from sump
Telephone	.Solvent still area (adjacent to hazardous waste storage building)	Explosion-proof; communication access to Emergency Coordinator and response personnel
Fire Hose	.North wall of Building 66 (across Parker St. from storage building)	75 feet of 1 1/2" hose (capable of storage building coverage) 50 gpm discharge capacity
Sprinkler System	.Inside hazardous waste storage building	Exceeds "high hazard protection" (69 ft^2 floor space per sprinkler head) 50 gpm discharge capacity
Fire Extinguisher	.Inside hazardous waste storage building	15 lb. CO_2; Cover AB & C fires A-wood, cloth, paper B-flammable liquids C-electrical
Fire Alarm	.Outside wall of Building 36; approx. 50 ft. from entrance of drum storage building	Notify Fire Dept.

VIII - EMERGENCY EVACUATION ROUTES

FROM VARIOUS AREAS

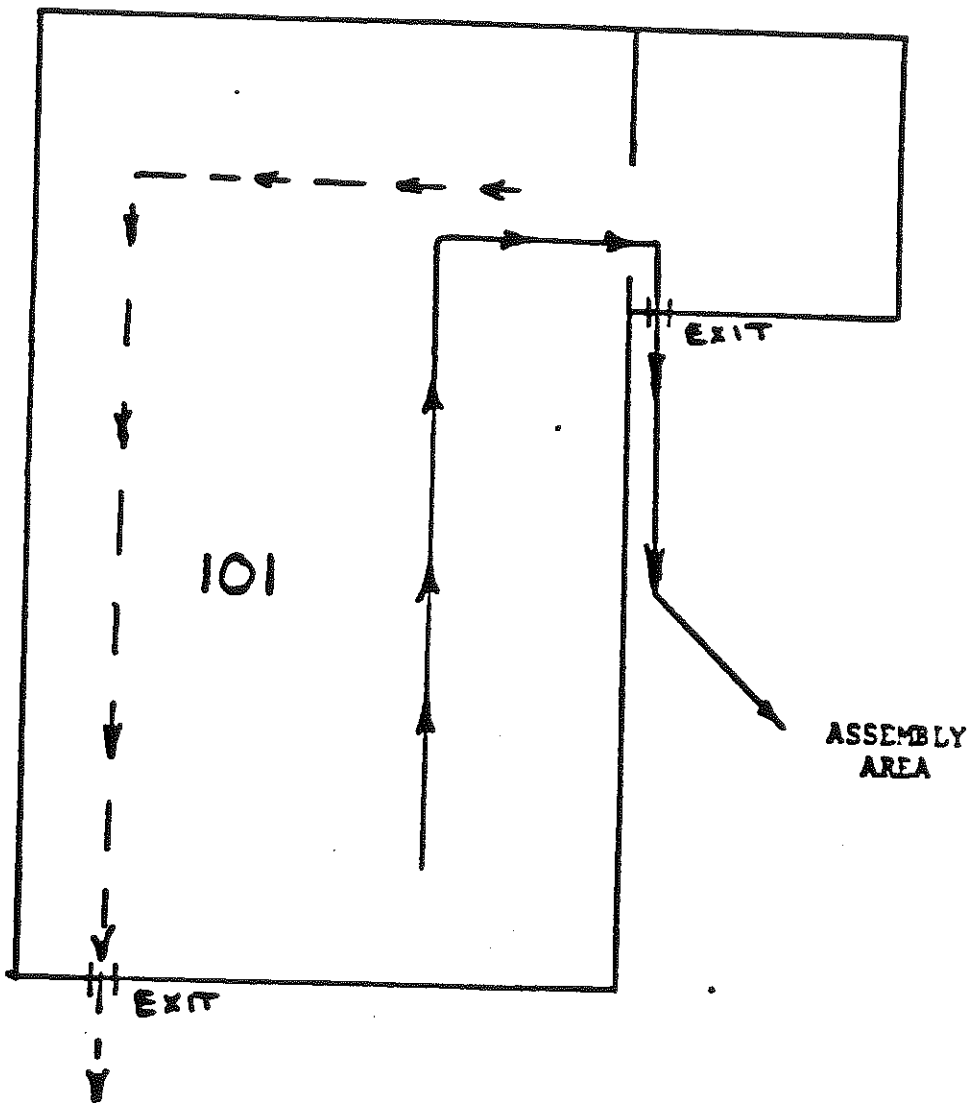
IN THE FACILITY

DATE: September 30, 1983
REVISION NO: 1

CHROME PLATING DEPARTMENT
EMERGENCY EVACUATION ROUTES

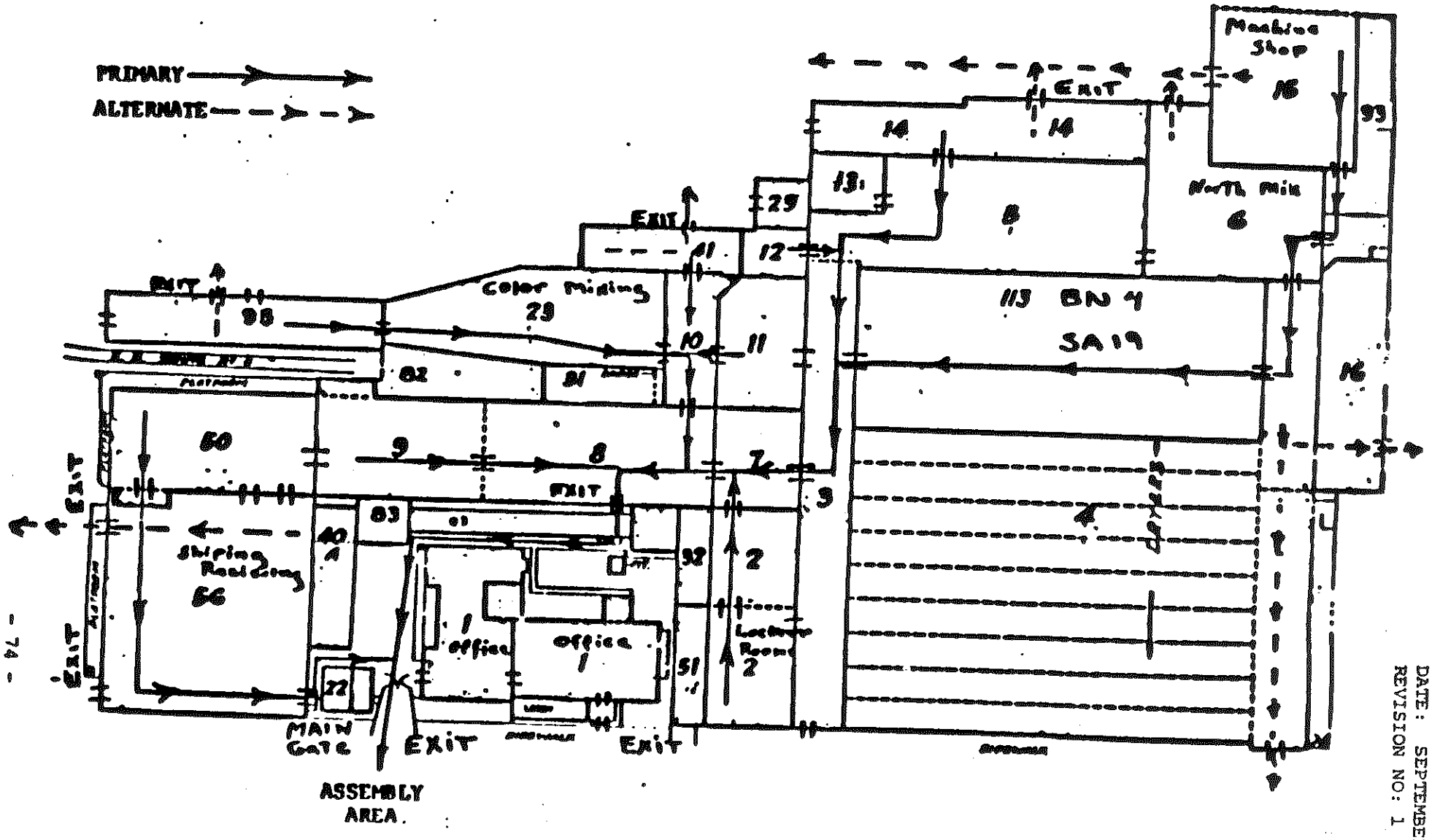
PRIMARY

ALTERNATE



IMMEDIATELY FOLLOWING EMERGENCY EVACUATION, CHROME PLATING DEPARTMENT EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

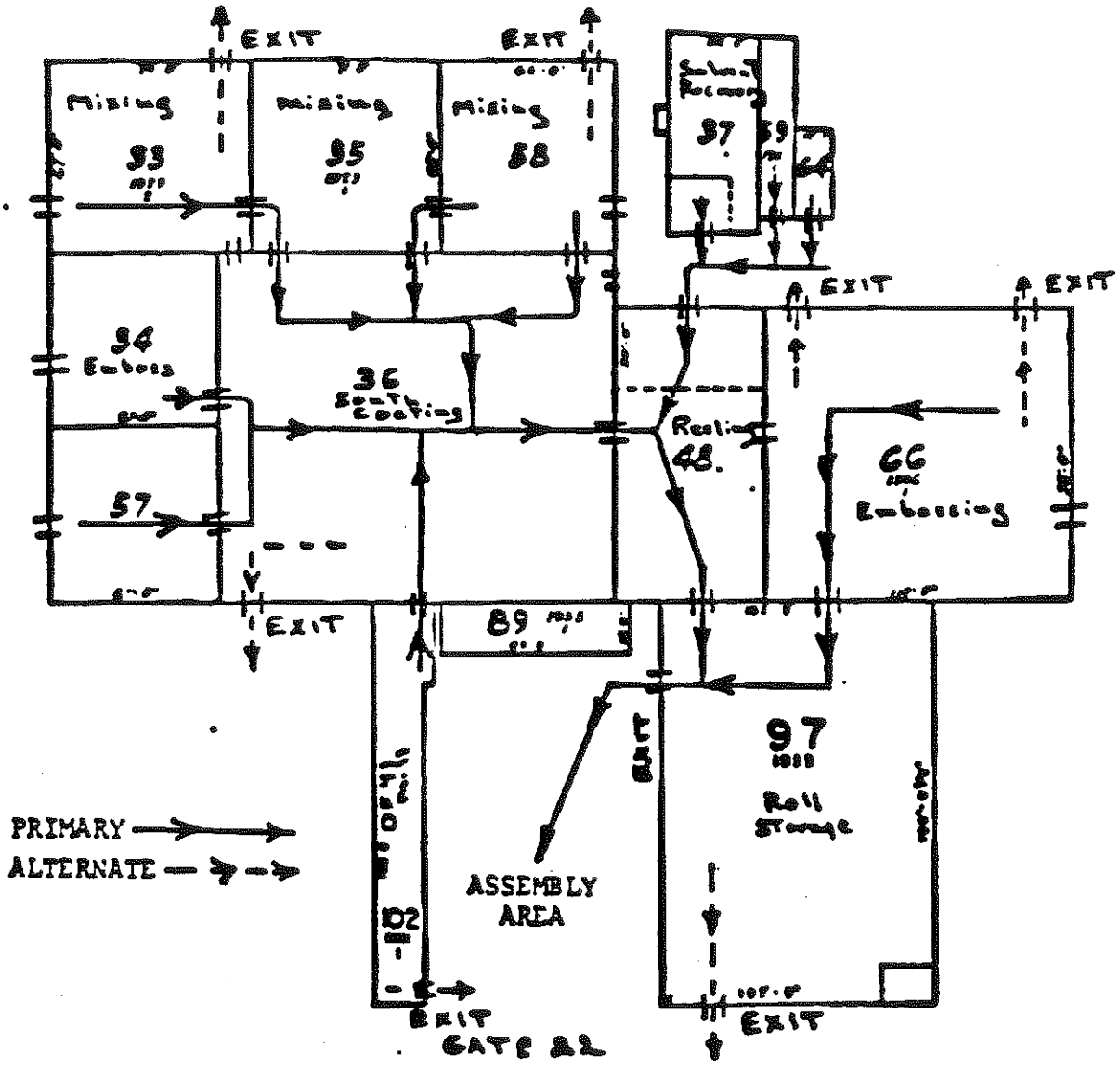
NORTH COATING, MIXING, MA NANCE, SHIPPING AND RECEIVING
EMERGENCY EVACUATION ROUTE



IMMEDIATELY FOLLOWING EVACUATION, NORTH COATING, MIXING, MAINTENANCE, SHIPPING AND RECEIVING DEPARTMENT EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

DATE: SEPTEMBER 30, 1983
REVISION NO: 1

EMERGENCY EVACUATION ROUTES

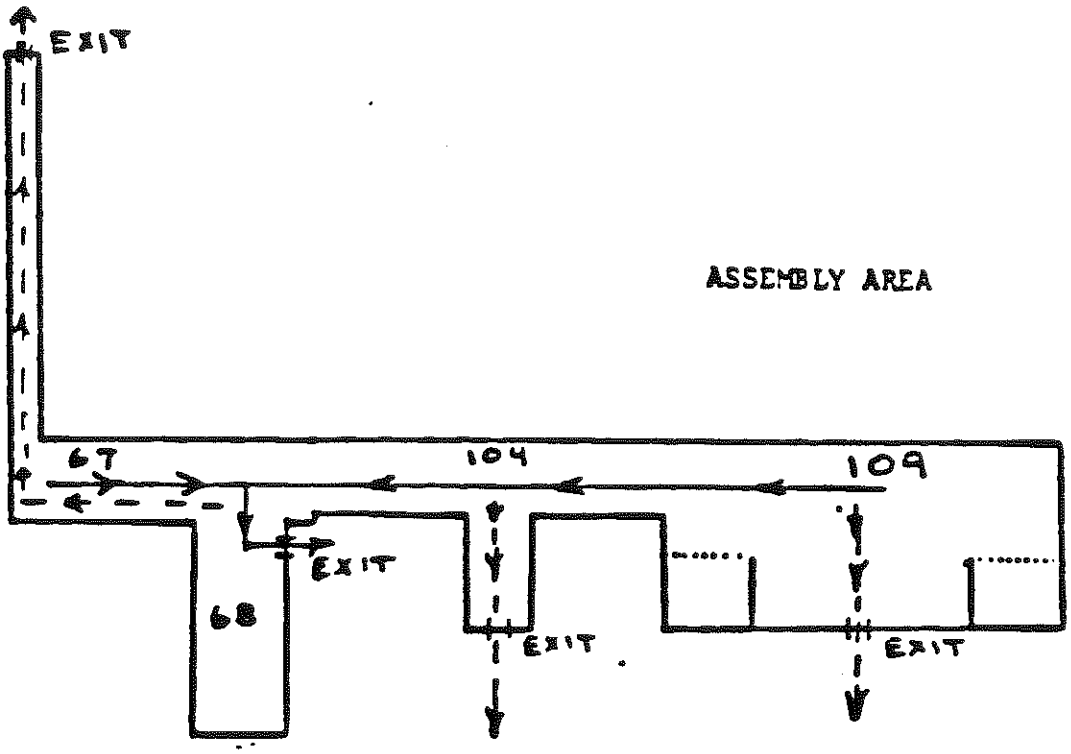


IMMEDIATELY FOLLOWING EMERGENCY EVACUATION, SOUTH COATING, MIXING, SOLVENT RECOVERY, EMBOSSING AND ROLL STACKER EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

CALENDER PRE-MIX DEPARTMENT

EMERGENCY EVACUATION ROUTE

DATE: September 30, 1983
REVISION NO: 1



PRIMARY ——→

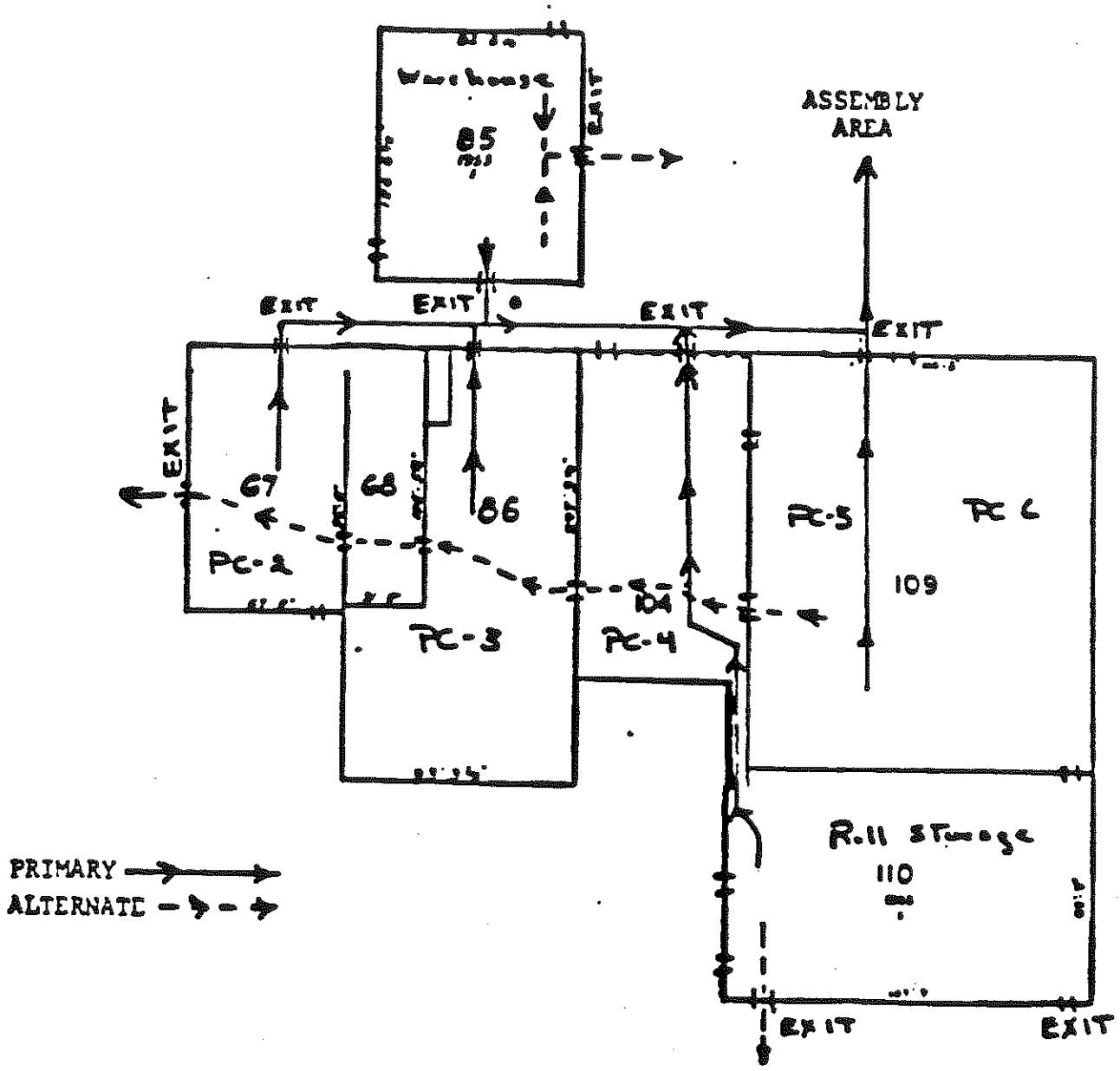
ALTERNATE →- - →- -

IMMEDIATELY FOLLOWING EMERGENCY EVACUATION CALENDER PRE-MIX EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

CALENDER DEPARTMENT

DATE: September 30, 1983
REVISION NO: 1

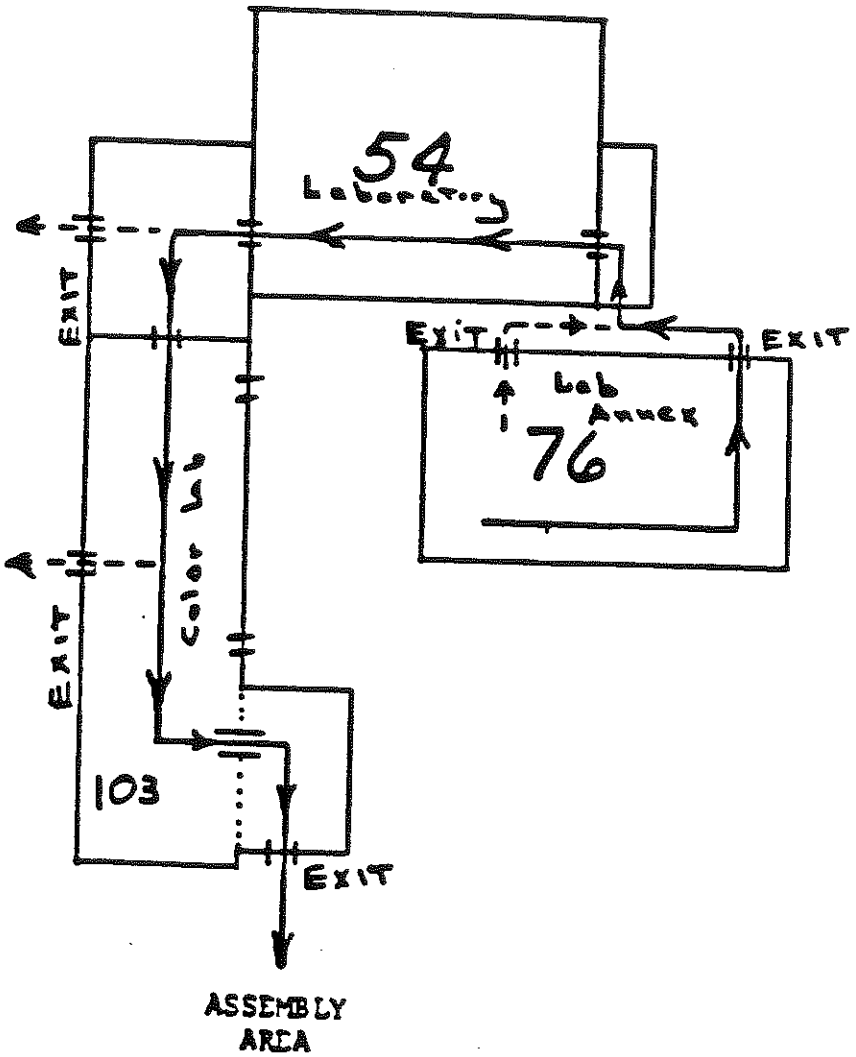
EMERGENCY EVACUATION ROUTES



IMMEDIATELY FOLLOWING EMERGENCY EVACUATION, CALENDER AND ROLL STACKER EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

LABORATORY FIRST FLOOR
EMERGENCY EVACUATION ROUTES

DATE: September 30, 1983
REVISION NO: 1



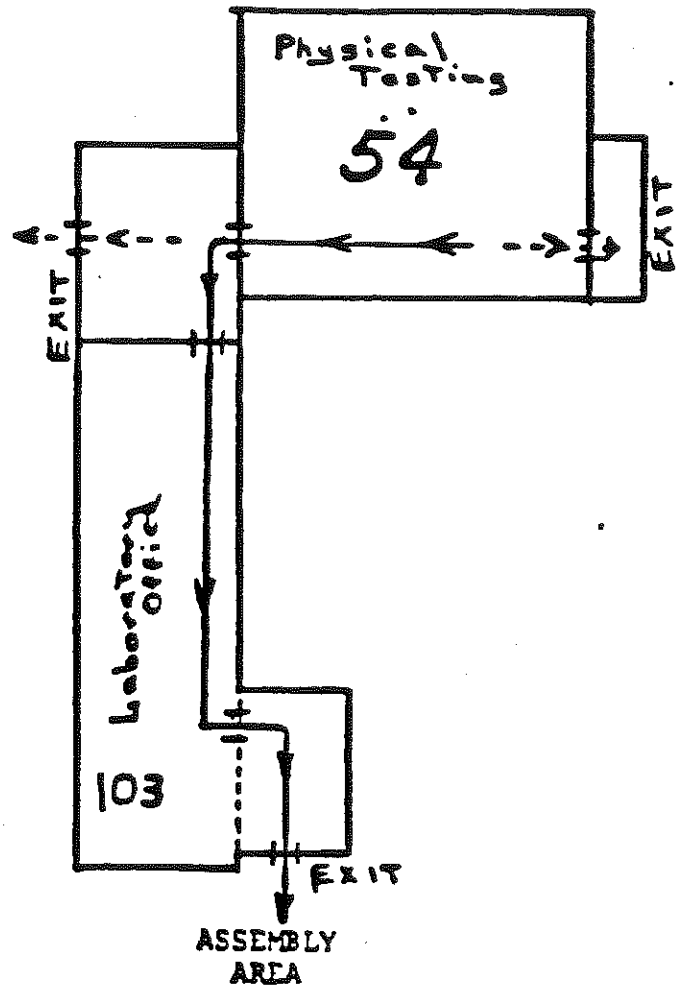
PRIMARY →

ALTERNATE - - →

IMMEDIATELY FOLLOWING EVACUATION, LABORATORY EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

LABORATORY SECOND FLOOR
EMERGENCY EVACUATION ROUTES

DATE: September 30, 1983
REVISION NO: 1



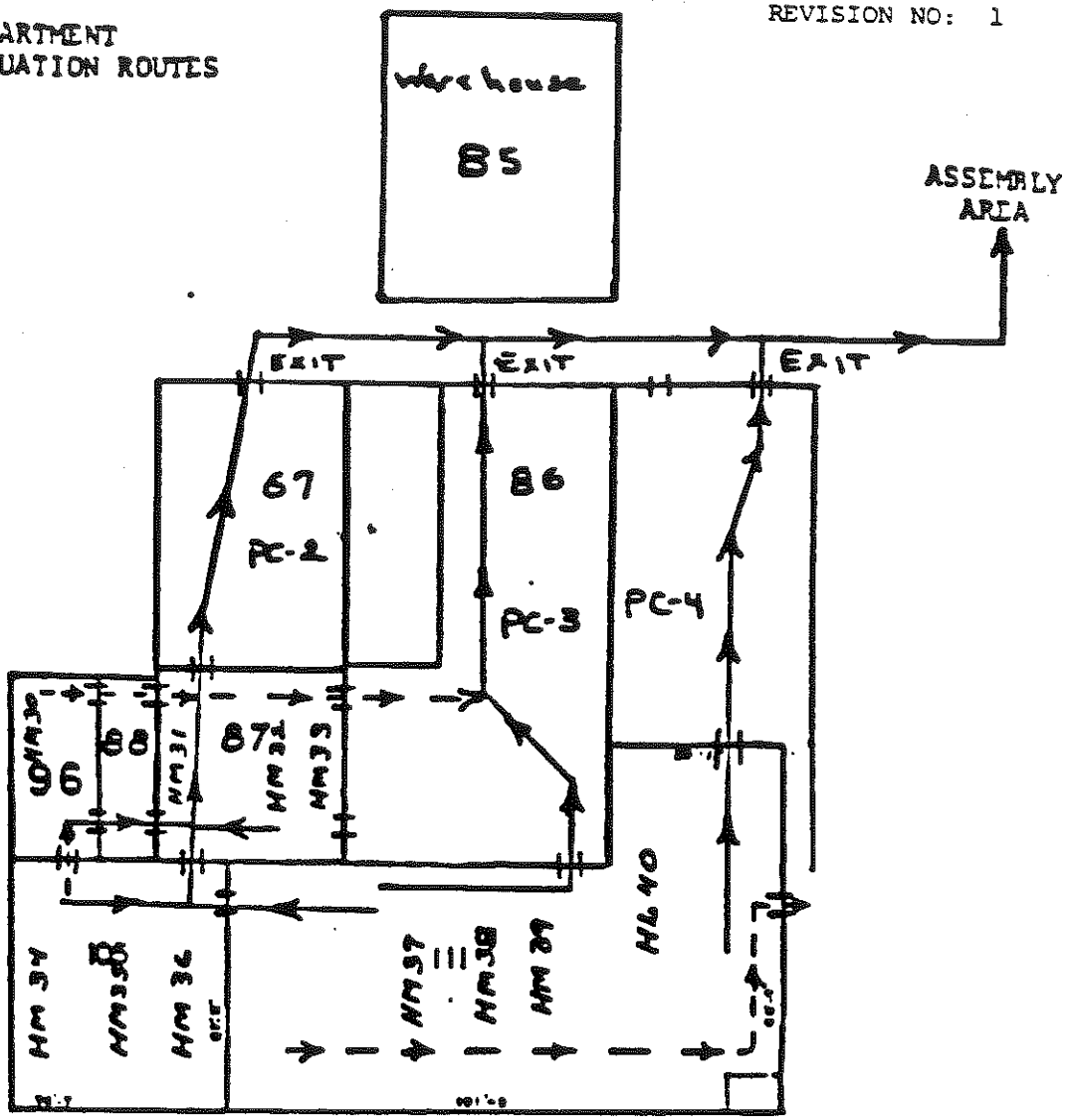
PRIMARY ——→

ALTERNATE - - →

IMMEDIATELY FOLLOWING EVACUATION, LABORATORY EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

DATE: September 30, 1983
REVISION NO: 1

PRINT DEPARTMENT
EMERGENCY EVACUATION ROUTES



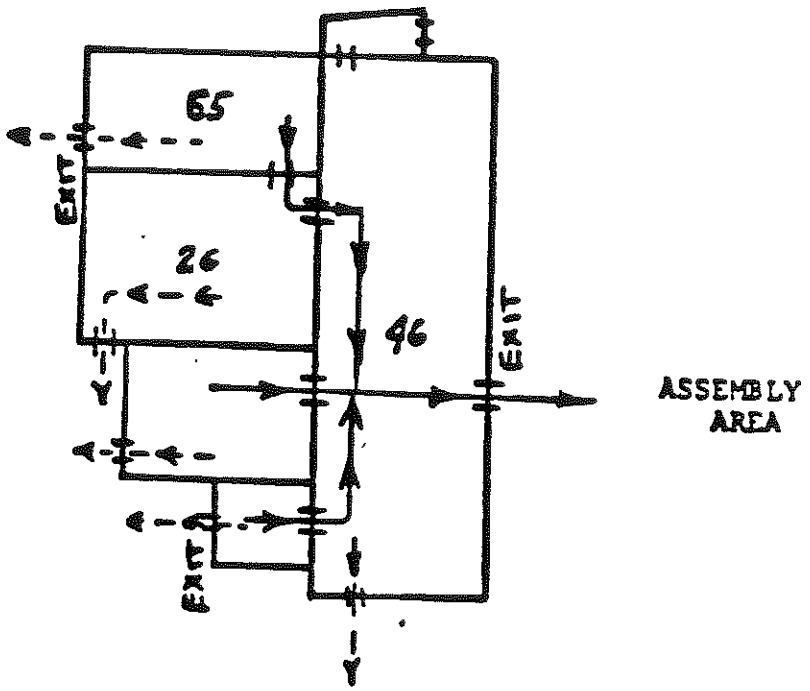
PRIMARY ——→——→

ALTERNATE — → — →

IMMEDIATELY FOLLOWING EVACUATION, PRINT DEPARTMENT EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

SAMPLE DEPARTMENT
EMERGENCY EVACUATION ROUTE

DATE: September 30, 198
REVISION NO: 1



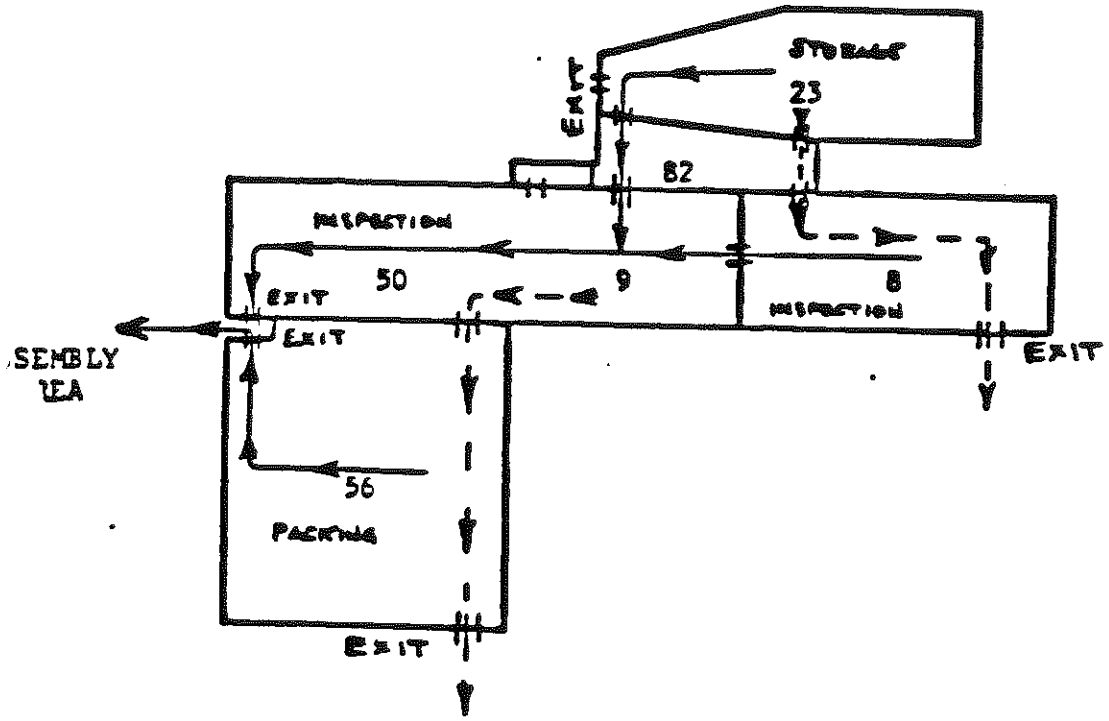
PRIMARY →

ALTERNATE → - - →

IMMEDIATELY FOLLOWING EVACUATION, SAMPLE DEPARTMENT EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

CUSTOM INSPECTION/PACKING EMERGENCY EVACUATION ROUTE

DATE: September 30, 1983
REVISION NO: 1



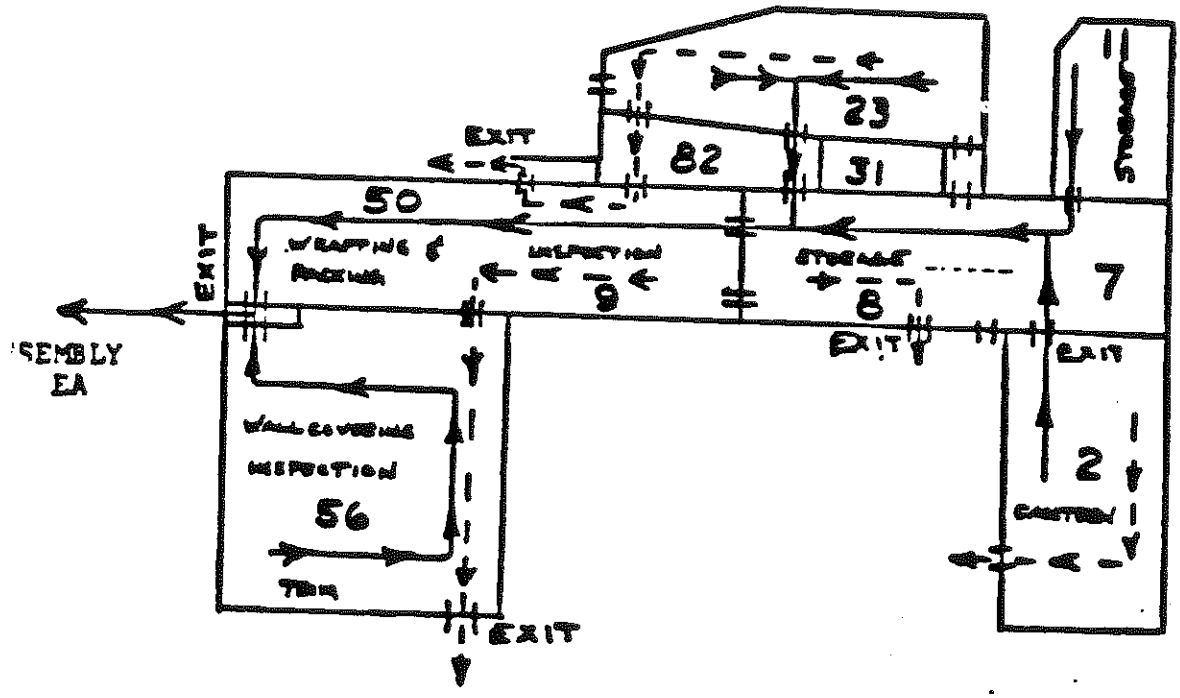
PRIMARY ——→——→

ALTERNATE →- - →- - →

- IMMEDIATELY FOLLOWING EVACUATION, CUSTOM INSPECTION AND PACKING DEPARTMENT EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

WALL ERING INSPECTION, WRAPPING / PACKING
EMERGENCY EVACUATION ROUTE

DATE: September 30, 1
REVISION NO: 1



PRIMARY →

ALTERNATE → - - - →

IMMEDIATELY FOLLOWING EVACUATION, WALLCOVERING INSPECTION, WRAPPING, PACKING AND TRIM DEPARTMENT EMPLOYEES MUST REPORT TO THE DESIGNATED ASSEMBLY AREA FOR ROLL CALL.

IX - WRITTEN REPORT SPECIFICATIONS

Any incident that requires implementation of the contingency plan will be recorded in the operating record as to the time, date and details.

Within 15 days following the incident, a written report will be submitted to the Regional Administrator and the appropriate Ohio EPA authority.

This report will include:

1. Name, addresses and telephone numbers as follows:

   a. Columbus Coated Fabrics (614) 225-6274
   1280 North Grant Avenue
   Columbus, Ohio 43201

   b. Borden Inc. (614) 225-4000
   180 East Broad Street
   Columbus, Ohio 43215

2. Date, time and type of incident.

3. Name and quantity of material(s) involved.

4. Extent of injuries, if any.

5. An assessment of actual or potential hazards to human health or the environment, if applicable.

6. Estimate quantity and disposition of recovered materials resulting from the incident.

DATE: November 21, 1983

REVISION NO. 2

X - LETTERS OF TRANSMITTAL

In order to familiarize the local fire, police and hospitals on the properties of the wastes handled and the fire and emergency access routes, the contingency plan has been submitted to these aforementioned agencies. As any updates of the contingency plan, as initiated, they will be forwarded to these agencies.

The following letters indicate the submission of contingency and emergency evacuation plans in order to fulfill coordination agreement requirements.

The hazards represented by the wastes handled and the potential exposure to these hazards are of particular value to the agencies receiving the contingency plan. This information is located on pages 62a, 62b, 62c, 62d, 62e, and 62f.

COLUMBUS COATED FABRICS
Division of Borden Chemical, Borden Inc.

BORDEN

June 7, 1982

Earl Burden,
Police Chief
City of Columbus
Police Division
120 West Gay Street
Columbus, Ohio 43215

Dear Chief Burden:

Attached is the Spill Prevention Control and Countermeasures Plan and the Emergency Action Plan for the Columbus Coated Fabrics facility at 1280 North Grant Avenue. These are being supplied to you in order to comply with the RCRA regulations.

Please supply these plans to the appropriate persons. These forms are to be considered confidential since Columbus Coated Fabrics feels there is proprietary information contained therein. Please use your discretion in disclosing the process chemical information only as is necessary in carrying out your required function.

Sincerely,

William G. Ilg
Sr. Project Engineer
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden Inc.

/db
Attachments

1280 NORTH GRANT AVENUE, COLUMBUS, OHIO 43216 · TELEPHONE (614) 225-4000 · TELEX 246-670

COLUMBUS COATED FABRICS
Division of Borden Chemical, Borden Inc.

BORDEN

June 7, 1982

Raymond R. Fadley
Fire Chief
Division of Fire
City of Columbus
200 Greenlawn Avenue
Columbus, Ohio 43223

Dear Chief Fadley:

Attached is the Spill Prevention Control and Countermeasures Plan and the Emergency Action Plan for the Columbus Coated Fabrics facility at 1280 North Grant Avenue. These are being supplied to you in order to comply with the RCRA regulations.

Please supply these plans to the appropriate persons. These forms are to be considered confidential since Columbus Coated Fabrics feels there is proprietary information contained therein. Please use your discretion in disclosing the process chemical information only as is necessary in carrying out your required function.

Sincerely,

William G. Ilg

William G. Ilg
Sr. Project Engineer
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden Inc.

/db
Attachments

COLUMBUS COATED FABRICS
Division of Borden Chemical, Borden Inc.

June 7, 1982

Riverside Hospital
Administration
3535 Olentangy River Road
Columbus, Ohio 43214

Gentlemen:

Attached is the Spill Prevention Control and Countermeasures Plan and the Emergency Action Plan for the Columbus Coated Fabrics facility at 1280 North Grant Avenue. These are being supplied to you in order to comply with the RCRA regulations.

Please supply these plans to the appropriate persons. These forms are to be considered confidential since Columbus Coated Fabrics feels there is proprietary information contained therein. Please use your discretion in disclosing the process chemical information only as is necessary in carrying out your required function.

Sincerely,

William G. Ilg
Sr. Project Engineer
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden Inc.

/db
Attachments

1280 NORTH GRANT AVENUE, COLUMBUS, OHIO 43216 · TELEPHONE (614) 294-4931 · TELEX 246-570

COLUMBUS COATED FABRICS
Division of Borden Chemical, Borden Inc.

BORDEN

June 7, 1982

Grant Hospital
Administration
300 East State Street
Columbus, Ohio 43215

Gentlemen:

Attached is the Spill Prevention Control and Countermeasures Plan and the Emergency Action Plan for the Columbus Coated Fabrics facility at 1280 North Grant Avenue. These are being supplied to you in order to comply with the RCRA regulations.

Please supply these plans to the appropriate persons. These forms are to be considered confidential since Columbus Coated Fabrics feels there is proprietary information contained therein. Please use your discretion in disclosing the process chemical information only as is necessary in carrying out your required function.

Sincerely,

William G. Ilg

William G. Ilg
Sr. Project Engineer
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden Inc.

/db
Attachments

1280 NORTH GRANT AVENUE, COLUMBUS, OHIO 43216 · TELEPHONE (614) 225-4000 · TELEX 245-570

COLUMBUS COATED FABRICS
Division of Chemical Group Inc.

BORDEN

June 7, 1982

University Hospital
Administration, E-101 Rhodes Hall
450 West 10th Avenue
Columbus, Ohio 43210

Gentlemen:

Attached is the Spill Prevention Control and Countermeasures Plan and the Emergency Action Plan for the Columbus Coated Fabrics facility at 1280 North Grant Avenue. These are being supplied to you in order to comply with the RCRA regulations.

Please supply these plans to the appropriate persons. These forms are to be considered confidential since Columbus Coated Fabrics feels there is proprietary information contained therein. Please use your discretion in disclosing the process chemical information only as is necessary in carrying out your required function.

Sincerely,

William G. Ilg
Sr. Project Engineer
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden Inc.

/db
Attachments

1280 NORTH GRANT AVENUE, COLUMBUS, OHIO 43216 · TELEPHONE (614) 294-4931 · TELEX 245-570

COLUMBUS COATED FABRICS
Division of Borden Chemical, Borden Inc.

BORDEN

June 7, 1982

Doctors Hospital - North
Administration
1087 Dennison Avenue
Columbus, Ohio 43201

Gentlemen:

Attached is the Spill Prevention Control and Countermeasures Plan and the Emergency Action Plan for the Columbus Coated Fabrics facility at 1280 North Grant Avenue. These are being supplied to you in order to comply with the RCRA regulations.

Please supply these plans to the appropriate persons. These forms are to be considered confidential since Columbus Coated Fabrics feels there is proprietary information contained therein. Please use your discretion in disclosing the process chemical information only as is necessary in carrying out your required function.

Sincerely,

William G. Ilg

William G. Ilg
Sr. Project Engineer
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden Inc.

/db
Attachments

1280 NORTH GRANT AVENUE, COLUMBUS, OHIO 43216 · TELEPHONE (614) 225-4000 TELEX 245-670

COLUMBUS COATED FABRICS
Division of Borden Chemical, Borden Inc.

BORDEN

June 7, 1982

OEPA
Mr. Ken Schultz
Chief, Emergency Response Section
361 East Broad Street
P.O. Box 1049
Columbus, Ohio 43216

Dear Mr. Schultz:

Attached is the Spill Prevention Control and Countermeasures Plan and the Emergency Action Plan for the Columbus Coated Fabrics facility at 1280 North Grant Avenue. These are being supplied to you in order to comply with the RCRA regulations.

Sincerely,

William G. Ilg
Sr. Project Engineer
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden Inc.

/db
Attachments

1280 NORTH GRANT AVENUE, COLUMBUS, OHIO 43216-TELEPHONE (614) 225-4000-TELETYPE 810 482-1748-TELEX 24-8432

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT IV
Personnel Training Plan

Columbus Coated Fabrics
1280 North Grant Street
Columbus, Ohio

U.S. EPA ID #: OHD 004-294-351

(12) Personnel Training

(i) Figure 9 shows the organization of personnel at the facility. Management responsibilities involving actual handling of the wastes are split between the Hazardous Waste Management Coordinator, the Production of Waste Coordinator, and the Transportation Coordinator. Maintenance personnel (i.e. electricians and mechanics) work in the waste handling area when required to fix a malfunctioning piece of equipment, but they do not handle wastes directly.

(ii) Relative to and in response to emergencies, communication and alarm systems; hazardous waste personnel are trained in the classroom and on the job (automatic waste feed cut-off systems and ground water contamination responses are not applicable to the hazardous waste handling at CCF).

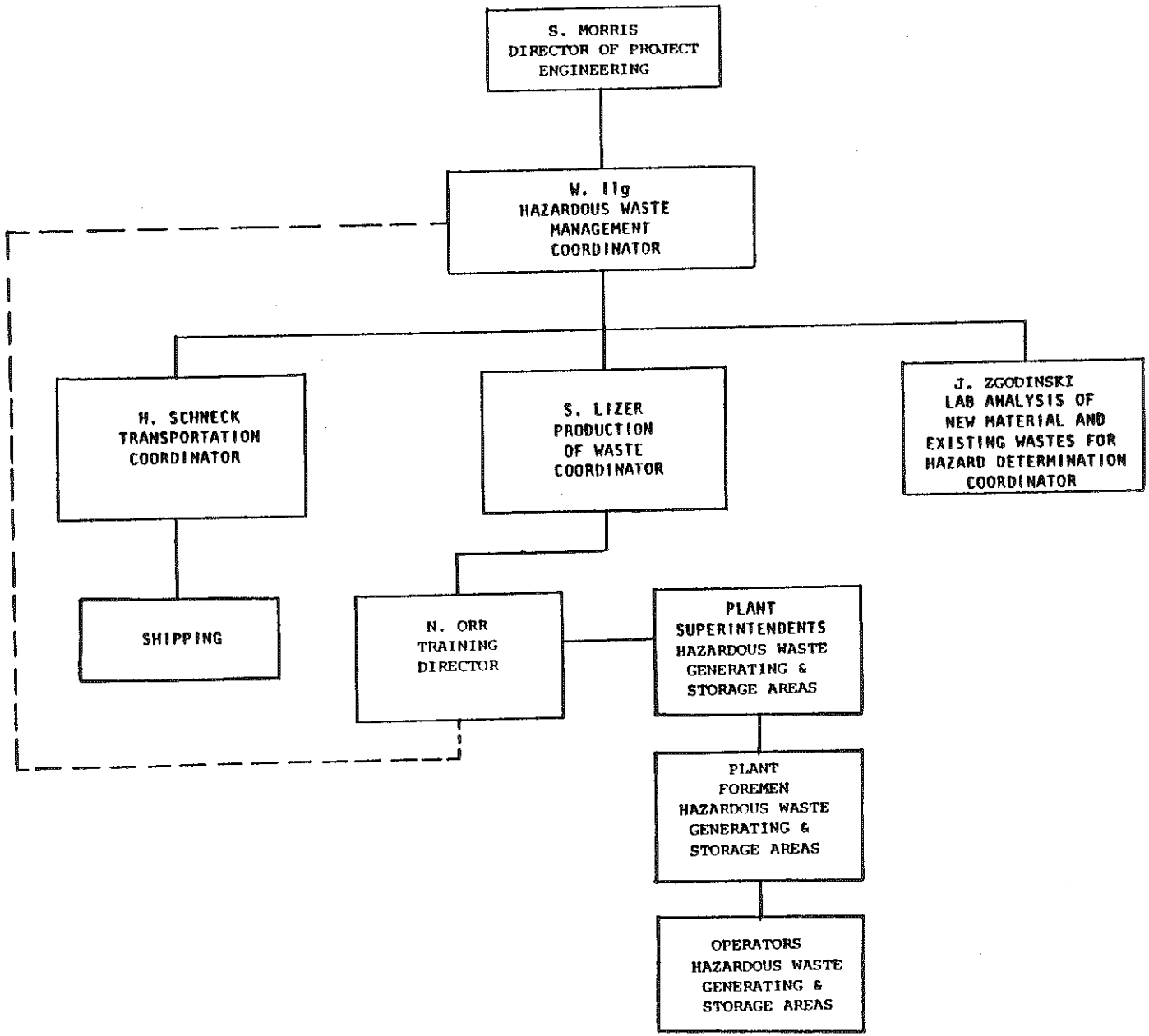
The safety director coordinates the training activity with the hazardous waste area foreman. The foreman oversees the training of the operators. The present operators assist the foreman in the training of new operators.

The safety director follows up in order to insure proper procedures are followed. Based on his observations, the safety director will change the training as he deems necessary.

(iii) The candidates for the positions described must have sufficient skills to fulfill the responsiblities listed.

(iv) The duties, responsibilities and qualifications of each position follow:

HAZARDOUS WASTE MANAGEMENT - CCF



DATE: February 4, 1983
REVISION NO: 1

FIGURE 9

DATE: February 4, 1983
Revision No: 1

Position Title: Hazardous Waste Management Coordinator

Name of Employee: William G. Ilg

Position Responsibilities and Duites:

- Coordinates all hazardous waste activities.
- Obtains all required permits and licenses or modifications of same from local, state, and Federal regulatory bodies.
- Resolves problems involving permits and licenses from local, state, and Federal regulatory agencies.
- Reports to Plant Engineer.
- Inspects plant grounds and all facilities for status of air, water, and solid/hazardous waste emissions and controls.
- Consults with maintenance foreman on questions involving emergency action.
- Drafts and submits all required reports to EPA or the State.
- Advises training director as to specific training details for hazardous waste handling.

Experience and Qualifications:

- Mechanical Engineering Degree.
- 2½ years experience in industrial pollution control management.
- Attended seminars on Hazardous Wastes Management and Control and DOT regulations concerning Hazardous wastes.
- Member of the Environmental Committee of the Chemical Fabrics & Film Association.

Position Title: Production Of Waste Coordinator

Name of Employee: Sam Lizer

Position Responsibilities and Duties:

- Overall operation and maintenance of the hazardous waste storage facility.
- Maintains facility compliance with RCRA and other permits.
- Oversees operators and reviews their performance in particular in the areas of:

  Operate materials/drum handling equipment safely and effectively. Handle leaks, spills, and emergency situations.

- Notifies plant environmental engineer, General Manager, and if so directed, proper authorities in emergency situations.
- Schedules all maintenance and repairs to structures and equipment for HWM facility.
- Is responsible for mechanic/electrician doing both scheduled and unscheduled maintenance and repair work to be sure he is not releasing hazardous wastes to the environment or contaminating himself.

Experience and Qualifications:

- 30 years experience in plant operation.
- Attended college for two years - majoring in Chemical Engineering.

DATE: February 4, 1983
REVISION NO: 0

Position Title: Safety Director

Name of Employee: Norman Orr

Position Responsibilities And Duties
(Pertaining to Hazardous Waste)

- Supervision of plant foremen in hazardous waste training.
- Maintaining training records of personnel handling hazardous waste.
- Makes periodic inspections and observations of hazardous waste handling.
- Follows up to insure proper procedures are being followed and discrepancies are corrected.

Experience and Qualifications

- B.S. Degree
- Attended Corporate Session on Overview of Hazardous Waste Regulations
- National Safety Academy Training Seminar

Position Title: Foreman

Position Responsibilities:

- Reports to Superintendent
- Inspects tanks, drums, and other storage equipment, and any gauges, dials, and recorders as required for proper operation and structural integrity.
- Inspects drum storage area for evidence of leaks and spills and inappropriately placed drums.
- Inspects emergency equipment on a regular basis.
- Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.
- Makes appropriate entries into operating log, monitoring records, inspection records, and maintenance records, and files them according to established system.
- Notifies Superintendent and other plant authorities as necessary in emergency situations.
- Takes emergency action on own authority in accordance with established procedures.

Note: If applicant has no hazardous waste experience, special training in the functions and operation of a hazardous waste storage facility will be required before assuming job responsibilities. This training will be provided by Columbus Coated Fabrics.

Position Title: Operators

Position Responsibilities:

- Reports to area operations foreman.
- Operates waste handling equipment.
- Reviews all incoming wastes and assigns wastes to proper storage location.
- Reports malfunctions and problems with tanks, drums, and other storage equipment, and any gauges, dials, and recorders as required for proper operation and structural integrity.
- Reports any evidence of leaks and spills and inappropriately placed drums.
- Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.
- Makes appropriate entires into operating log.
- Notifies foreman and other plant authorities as necessary in emergency situations.
- Takes emergency action on own authority in accordance with established procedures.

ii. Following are copies of typical operating record sheets documenting the training of the involved personnel handling hazardous wastes.

Figure 10

DATE: February 4, 1983
Revision 1

TRAINING PROGRAM File — Solvent Recovery

	NAME	DATE	INSTRUCTOR	ADDITIONAL REMARKS
1	Charles Hollis	6-21-82	EV Burleson	
2	Brian Andrews	6-21-82	J Horne	
3				
4				
5				
6				
7				
8				

AN UP-DATE OF TRAINING EVERY SIX MONTH

1.				
2				
3.				
4				
5				
6				
7				
8				

Figure 11

DATE: February 4, 1983
REVISION NO. 1

HAZARDOUS WASTE HANDLING

PLASTIC PRE-MIX DUST STOP OIL

Removing oil and residue from banburys

Using proper containers for oils and residue

Using proper labels on containers

Storing full containers in designated areas

I have been instructed in the above procedures for handling of hazardous waste materials.

Signed: Employee _____

Instructor _____

Date: 7-26-82

(iii) Training in Hazardous Waste Handling is an element of the general training for the involved personnel.

(iv) Initial employee indoctrination by the Safety Manager concerning safety in the facility involves a discussion of Hazardous Wastes.

FORM 1022C

DATE: May 6, 1983
REVISION NO.: 0

INTER-COMPANY AND OFFICE CORRESPONDENCE

TO: WHOM IT MAY CONCERN

FROM: NORMAN ORR

LOCATED AT:

{ Dept. Branch Division Company

SUBJECT:

DATE: MAY 3, 1983

Included in the Hazardous Waste Handling training sessions, is an explanation of the chemicals, Lead, Chromium and Cadmium, that are present in waste products developed at Solvent Recovery and Calender Pre-Mix departments. Employees are informed that these chemicals are hazardous to their health under over exposed conditions. OSHA approved respirators are available and all employees are instructed on the proper use of safety equipment.

Norman Orr
Safety Manager

NLO/am

(v) All workers in the facility are thoroughly instructed in the handling of ignitable materials since any of the process materials have a lower ignitability temperature than the various types of hazardous wastes generated.

(a) No ignition sources are allowed in the facility except in designated areas.

(b) No smoking is allowed in entire facility other than in designated areas.

(c) No matches allowed in production areas.

(vi) All workers are instructed in the procedure to be followed in case of a fire and/or emergency.

(vii) All workers are instructed in the location of fire alarms and emergency escape routes.

(viii) The employees working in the Solvent Still area who handle the still bottoms in its liquid and solid form receive training in addition to the standard training given to all employees described in (v), (vi) and (vii) above. This additional training includes all of the following.

(a) The empty hazardous waste drums are placed in a pit at the unloading point for the still. Any spillage encountered in the filling of the drum is therefore contained in the pit.

(b) The still bottoms solid and/or liquid from one batch which normally fill 4 to 5 55 gallon drums are then scraped out of the still into the standard #17E Hazardous Waste Orange Drums.

(c) Any of the solid sludge that has spilled into the pit is manually shovelled into the hazardous waste drums containing the solid form of the waste.

(d) The operator fills the solid waste drums to within 4" to 6" of the top. Any liquid rising to the surface is dipped out into a hazardous waste drum containing still bottom liquid.

(e) The solid waste drum is then checked by means of the Solids Test described on Pg. 37 - (iv). If the check shows any free liquid, adsorbent material and/or ashes are added and mixed until the test indicates the material has met the solid criteria as per the test.

(f) After the solid waste drum has passed the previously described test, the last 4" to 6" of this drum is filled to within 1" of the top with ashes. The last 1" is filled with an adsorbent material such as "floor dry".

(g) The solid sludge drum is then sealed with a lid, gasket and locking ring.

(h) A hazardous waste sticker is placed on the drum stating "Flammable Solid".

(i) A second hazard waste sticker is attached describing the waste and the date the drum was filled with the signature of the operator.

(j) The solid waste drums are also stenciled with the CECOS Hazardous Waste Number (1271-A).

(k) Any liquid that is generated in the still process is placed in a separate liquid waste drum in the pit.

(l) Any of the liquid that has spilled into the pit is pumped into the liquid waste drum.

(m) As previously stated, any liquid from the solid drums is also placed in the liquid drums.

(n) The liquid drums are filled to the top - sealed with a lid, gasket and a locking ring.

(o) A label is affixed stating "Flammable Liquid".

(p) A second label applied to the drum stating the type of hazardous waste with the product waste code number, the date the drum was filled and the name of the operator filling the drum

(q) The liquid hazardous waste drums also are stenciled with the Ross Incineration Product Code (WPS 5485).

(r) After the solid and liquid hazardous waste drums are filled, they are pallatized and placed in the Hazardous Waste Storage Building by means of a fork lift truck.

(s) Any spills occurring on the concrete apron of the work area are contained and immediately cleaned up by the operator with sand and/or an adsorbent material. Any cleaning material used - such as rags, paper, towels, sand or floor dry, is placed into hazardous waste containers for proper disposal.

(t) Employees handling hazardous wastes in the still process are informed of the hazardous chemicals in the waste, i.e. cadmium and lead, and of the ignitability of the solid and liquid forms.

(ix) Employes working in the Banbury Dust Stop Oil and Residue Area:

(a) The oils and residue leaking at the Banbury dust stops are hazardous waste.

(b) This waste is hazardous since its cadmium content is in excess of 1 ppm. The waste is also ignitable (see employee training concerning ignitable material - Part (v) above).

(c) The operator on duty is responsible for the proper handling of this material in his/her working area.

(d) The oil and residue that leaks from the Banbury dust stops into troughs must occasionally be scraped by the operator into a container designed to catch material.

(e) When containers are full, the operator must dispose of the material into proper hazardous waste storage drums - 17E orange drums.

(f) These 55 gallon drums are stored in the Parker Street alley adjacent to the Banbury rooms.

(g) Operators will secure empty hazardous waste drums as required and position in Banbury rooms.

(h) After the flow pans are full, they are emptied into 55-gallon hazardous waste drums. The material is allowed to sit idle over night and the oil then is removed from the top of each drum and put into a separate hazardous waste liquid drum.

(i) When the solid and liquid drums are full, they are sealed, gasketed and a locking ring installed.

(j) The drums are tagged and stenciled with proper tags and EPA numbers, palletized and taken to the hazardous waste storage building for storage.

(k) The oil drums will have a "flammable liquid" label attached as well as a hazardous material label bearing the description of the waste, the date and the signature of the operator.

(l) The drums with residue will have a flammable solid label attached as well as a hazardous material label bearing the description of the waste, date and the name of the operator.

(m) Any spillage of hazardous waste is to be cleaned up immediately.

(n) Any cleaning materials, such as rags, paper towels and floor dry, used in cleaning up spillages must be put into hazardous waste containers for proper disposal.

(o) The drums of residue will have stencilled a CECOS Code Number 2471-C.

(p) The drums of oil are shipped to SYSTECH with a Systech Waste Number of STC-14-2007.

(x) Employees handling hazardous wastes in both these areas are furnished with work uniforms.

(a) If uniforms, due to a spill, become grossly contaminated, they are disposed of as a hazardous waste.

(xi) Plating Sump Area

(a) No CCF personnel directly handle this waste. Hazardous Waste Contractor removes the waste from the pit with a suction hose into a tank truck.

(xii) Implementation of Training Program

All current waste-handling personnel have been fully trained at the time of this submittal. In the future

all new personnel will complete this training program within 6 months of assignment to the hazardous waste storage facility or within 6 months of their date of employment, whichever is later. No employee hired to work at this facility will work unsupervised prior to completion of the training program.

Employees are required to meet twice per year for review and update of this training program. Furthermore, the following subjects will be discussed and studied:

(a) All hazardous wastes currently being handled at the facility, noting any changes in waste type, volume, source, characteristics, or location that have occurred during the past year.

(b) The status of storage and operating conditions and procedures, noting any areas where there are problems or potential for problems. Employees participate in developing effective solutions.

(c) The requirements contained in the facility's RCRA permit, noting any changes that have occurred during the past year. Areas where maintenance of compliance is a problem are identified and discussed, and effective solutions are sought.

(d) Incidents that have occurred in the past year that warranted use of contingency plans and/or emergency action. This review focuses on the cause of the incident and identification of steps to be taken to prevent or to ensure better handling of such events in the future.

Records documenting the job title for each position,

job descriptions, names of employees, and completed training programs (both introductory and review) will be kept onsite in the safety director's office of CCF. These records will be kept until closure of the facility for current employees and for 3 years from the date of the individual employee's termination for former employees.

DATE: May 6, 1983
REVISION NO: 0

FORM 1022C

BORDEN

INTER-COMPANY AND OFFICE CORRESPONDENCE

TO: DISTRIBUTION

FROM: W. G. Ilg
R. L. Johnston

LOCATED AT: CCF

DATE: March 30, 1983

{ Dept. Branch Division Company

SUBJECT: SPECIFIC OPERATING PROCEDURES RELATIVE TO THE HANDLING AND PROCESSING OF HAZARDOUS WASTE DUST-STOP OILS

Dust-stop oil is residue generated by the Banbury mixing process. Dust-stop oil contains a heavy metal, namely Cadrium, which has been declared a hazardous waste and, consequently, comes under stringent EPA disposal statutes.

Therefore, the following handling, processing and containerization procedures shall be strictly adhered to without any deviation.

Job Classification Responsible - Banbury Operators

1. Two (2) 55 gallon special (orange colored) hazardous waste drums shall be placed in each Banbury room.

   a) One drum shall be used for dust-stop solid waste only.
   b) One drum shall be used for dust-stop oils only.

2. Both drums shall be filled to within one-half inch (1/2") of the top. The drum containing the solid waste shall be free of any oil by pumping; any remaining solution shall be topped off using floor dry and/or ashes. NOTE: It is essential that absolutely no solution be found floating on the top prior to sealing the drum.

3. The drum containing dust-stop oil only will be sealed, placed on a 4 drum pallet and delivered by Dept. #10 Material Handling personnel to the hazardous waste storage building for staging until sufficient drum quantities are accumulated for subsequent removal by licensed hazardous wastes concerns.

4. It is absolutely forbidden to temporarily stage or store empty, but used, part full or full drums of dust-stop waste anywhere in other than the Banbury rooms or the hazardous waste storage building.

W. G. Ilg
Environmental

R. L. Johnston
Standards Engineering

/db

DISTRIBUTION

M. P. Kuskowski
D. H. Bibb
A. Ferguson
M. Z. Spriggs
R. L. McClellan

S. E. Lizer - Information
S. W. Morris - Information
N. L. Orr - Information
C. J. Oshinski - Information

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT VI
Closure Plan

Columbus Coated Fabrics
1280 North Grant Street
Columbus, Ohio

U.S. EPA ID #: OHD 004-294-351

(13) Closure Plan

(i) General Considerations

This plan identifies all steps necessary to close the facility at any point during its intended operating life. This facility consists of interdependent manufacturing processes; furthermore, drum storage of waste is expected to be required to the exclusion of any other regulated hazardous waste management facility. Hence, partial closure details are not applicable.

CCF will maintain an on-site copy of the closure plan and all revisions to the plan until certification of closure completeness has been submitted and accepted by the USEPA Region V and Ohio EPA. CCF will notify Region V and Ohio EPA at least 180 days prior to the date we expect to begin final closure steps.

The date of closure cannot be logically projected as this is an ongoing industrial facility - applying for a permit to temporarily store on-site.

However, if a date must be established for closure of the storage facility to store wastes for greater than 90 days, a date of 2050 will be used (irrespective of the production facility).

Upon completion of closure, CCF and an independent professional engineer will submit certifications of closure in accordance with the specifications in the approved closure plan.

This closure plan will specifically address the closure of the hazardous waste drum storage area and all areas,

equipment, etc., which could potentially be impacted by the hazardous waste. In addition to the drum storage area, these areas include the solvent still area, the Banbury mixers, the electroplating sump and the areas and equipment impacted in the handling and loading of these hazardous wastes. Although other hazardous materials (raw materials, etc.) are handled on-site and will be necessarily handled upon closure of the site, CCF will not address the closure activities associated with the hazardous materials not regulated by hazardous waste regulations.

(ii) Closure Performance Standard

This closure plan was designed (1) to ensure that the plant will not require further maintenance and controls due to hazardous waste, (2) to minimize or eliminate threats to human health and the environment due to hazardous waste and (3) to avoid escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or atmosphere. All of the waste handling areas are concrete paved areas, prohibiting migration of contaminants to underlying soils. However, in the unlikely event of suspected soil contamination as a result of a spill of <u>any</u> hazardous waste or material, samples will be taken and analyzed. Any contaminated soils will be excavated and disposed of at a hazardous waste disposal facility.

(iii) Maximum Waste Inventory

The maximum inventory of hazardous waste stored on-site at any given time during the operating life of the plant is 450 drums, the process design capacity for the drums storage facility.

(iv) Inventory Removal and Disposal or Decontamination of Equipment

(a) Drummed waste - full drums of solid waste will be transported for land disposal. Drums of liquid waste will be transported to a treatment facility (incineration).

Empty drums - any empty drums on-site which have residual hazardous waste will be rinsed with an appropriate solvent. The resultant wash waste will be recovered in the solvent still.

Leaking drums - any leaking drums of waste will be enclosed in an overpack drum for transport to the appropriate facility.

(b) Equipment decontamination - after all recyclable solvents have been treated, all piping in connection with the solvent still will be disconnected and dismantled. Any residual materials will be allowed to

drain and to be collected, then pipes will be allowed to air dry. The still bottoms collection tank and drumming pit will be steam-cleaned, with contaminated wash waters contained, collected and transported in drums or tank truck to the off-site treatment facility.

Fork lifts, shovels and squeeges used to move drums or handle waste will be steam-cleaned as necessary. Any other equipment, gloves, cloths, etc., which may be contaminated beyond the potential for cleaning, will be drummed and disposed of at the licensed disposal facility.

(c) Storage area decontamination - the hazardous waste drum storage area and, as needed, the surrounding drum handling areas, will be steam-cleaned of any residual waste material. The wash waters will be collected and transported by drums or tank truck to the off-site treatment facility.

(d) The areas surrounding, and including, the Banbury mixers, where waste is generated, will be steam-cleaned with wash waters collected and treated off-site.

(e) The sump in the electroplating portion of the plant,

where other wastes are generated, will be cleaned of any residual waste, and steam-cleaned, if necessary.

(f) Approximately 825 gallons of wash water and residue are anticipated to be generated during the container storage, solvent still, Banbury mixers, and electroplating sump decontamination processes.

(g) The off-site treatment and disposal facilities to which waste will be taken, are as follows:

Disposal

CECOS International, Inc.
Williamsburg, OH
EPA ID# OHD087433744

Incineration

Ross Incineration Services
Grafton, OH
EPA ID# OHD048415665

Treatment (Liquids)

Systech Liquid Treatment Corporation
Hillard, OH
EPA ID# OHD081290611

(h) Transporters of the waste will be:

Acme Liquid Waste
Westerville, OH
EPA ID# OHD000772723

CECOS (Cer) Transport
Cincinnati, OH
EPA ID# OHD087433744

Ross Transportation Services
Grafton, OH
EPA ID# OHD980614374

(v) Schedule for Closure

Within 90 days after generation of the final volume of process hazardous waste, final closure will be initiated. Notification to the appropriate agencies will take place 90 days before the generation of final volume of process hazardous waste. Completion of closure will be within 180 days of final closure initiation. The proposed schedule for closure is shown in Figure 12.

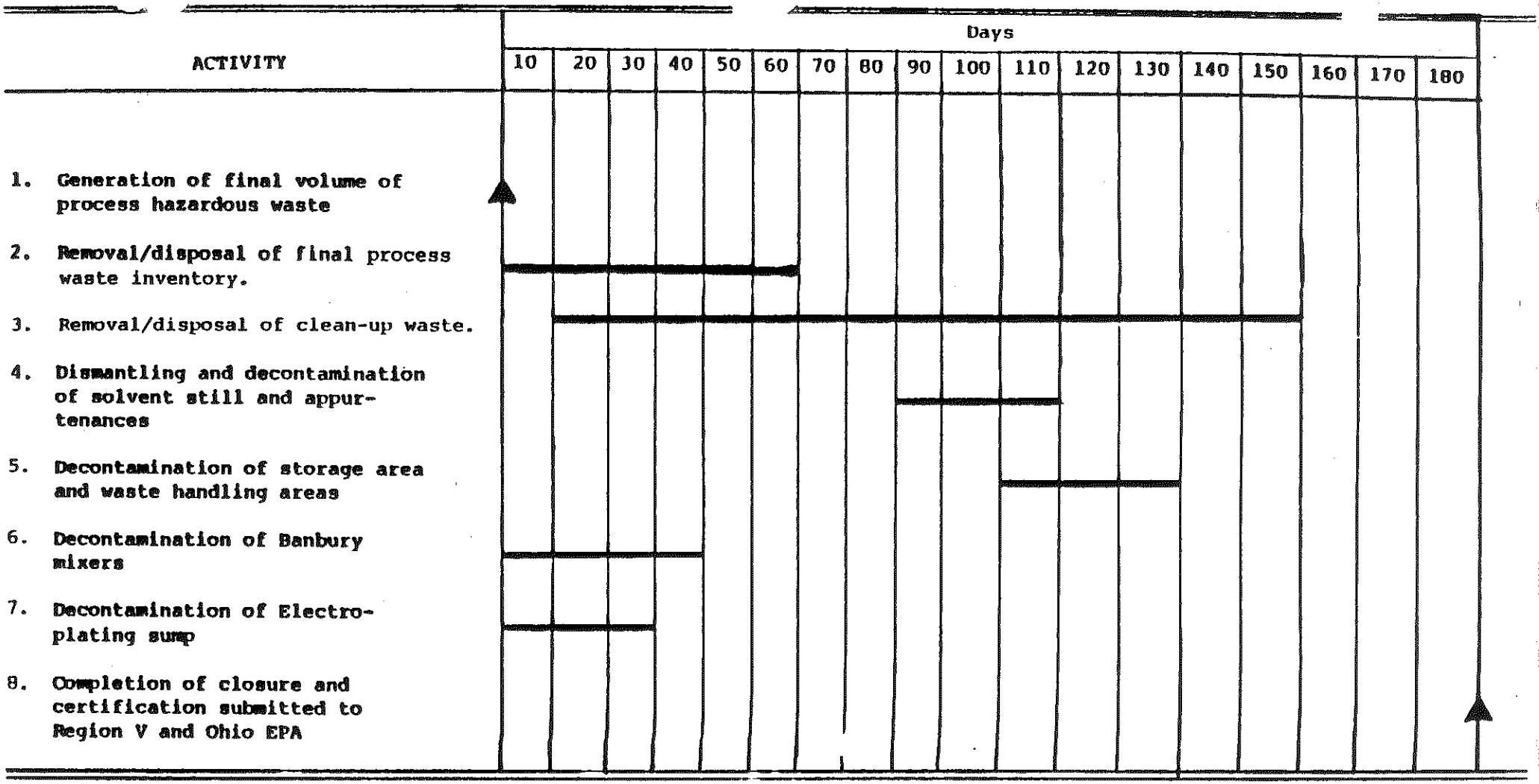
(vi) Post-closure Plan

Post-closure care will not be needed because no waste will be left on-site.

(vii) Closure Cost Estimate

Table 2, page 108, itemizes the costs associated with closure of the hazardous waste storage area.

The cost estimates will be revised upon any change in the closure plan. The cost estimates will be revised at least once annually on May 19, using the inflation factor derived from the annual Implicit Price Deflator for Gross National Product as publised by the U.S. Department of Commerce in its Survey of Current Business.



CLOSURE SCHEDULE

DATE: November 21, 1983
REVISION NO: 2

NOTE: 1. Disposal of final waste inventory includes the hazardous wastes generated due to the cleanup process.

2. This process continues throughout most of the closure schedule.

DATE: February 4, 1983
Revision I

Table 2 Closure Cost Estimate

	Drums	Cost Per Per Drum	Labor @ non-	Materials	Total
Waste Inventory Removal	450	non-			$26,550
Clean-up Wastes	15	non-			885
Still Clean-up			non-	$1,800	9,000
Plating Area Clean-up			non-	500	2,500
Banbury Mixer Clean-up			non-	500	3,380
Storage Area & Environs Clean-up			non-	1,000	10,000
Sub-Total					$52,315
non Contingency					5,232
TOTAL					$57,547

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT VII
Description of Wastes

Columbus Coated Fabrics
1280 North Grant Street
Columbus, Ohio

U.S. EPA ID #: OHD 004-294-351

DATE: February 4, 1983
REVISION NO: 1

(2) Hazardous Waste Analyses

Following are independent lab analyses of the Columbus Coated Fabrics Hazardous Wastes in Pages #33, 34, 35 & 36.

(i) Solvent Still Bottoms - Solid Form

(a) Are as described in lab analysis on Pg. #33.

(b) These still bottoms are generated at the solvent still located as point "A" on map Pg. #32c.

(c) The basis for the hazard designation is EP toxicity and ignitibility.

(1) EP Toxicity - excess the max. allowable lead concentration.

(2) Ignitability is 54°F and 130°C.

(d) These still bottoms are a listed hazardous waste - F005 and carries an assigned CECOS Hazardous Waste number of 1271A.

(ii) Solvent Still Bottoms - Liquid Form

(a) Are as described in lab analysis on Pg. #34.

(b) These liquid still bottoms are generated at the solvent still located as point "A" on map Pg. #32c.

(c) These liquid still bottoms are generated at the solvent still. They are produced in the approximate ratio of 1 liquid drum to 65 solid drums.

(d) The basis for the hazard designation is EP toxicity and ignitability.

(1) EP toxicity - exceeds the max. allowable lead and cadmium concentration.

(2) Ignitability is <22°F and <72°C.

(e) These still bottoms are a listed hazardous waste - F-005 and carries an assigned Ross Incineration Hazardous Waste number of WPS #5485.

(iii) Dust Stop Oil and Plasticizer Residue

(a) Are as described in lab analysis on Pg. #35.

(b) This oil and residue is generated at the dust stops of the Banbury mixers located as point "B" on map Pg. #32c.

(c) The basis for the hazard designation is EP toxicity.

EP toxicity - exceeds the maximum allowable cadmium concentration.

(d) This waste carries assigned Hazardous Waste number as follows:

(1) Oil portion - Systech Hazardous Waste #STC-14.2007.

(2) Plasticizer Residue Portion - CECOS Hazardous Waste #1271-C

(iv) Limestone Sump Plating Residue

(a) As described in lab analysis on Pg. #36.

(b) This plating sump residue is generated in the sump located as point "C" on map Pg. #32c.

(c) The basis for the hazard designation is EP toxicity.

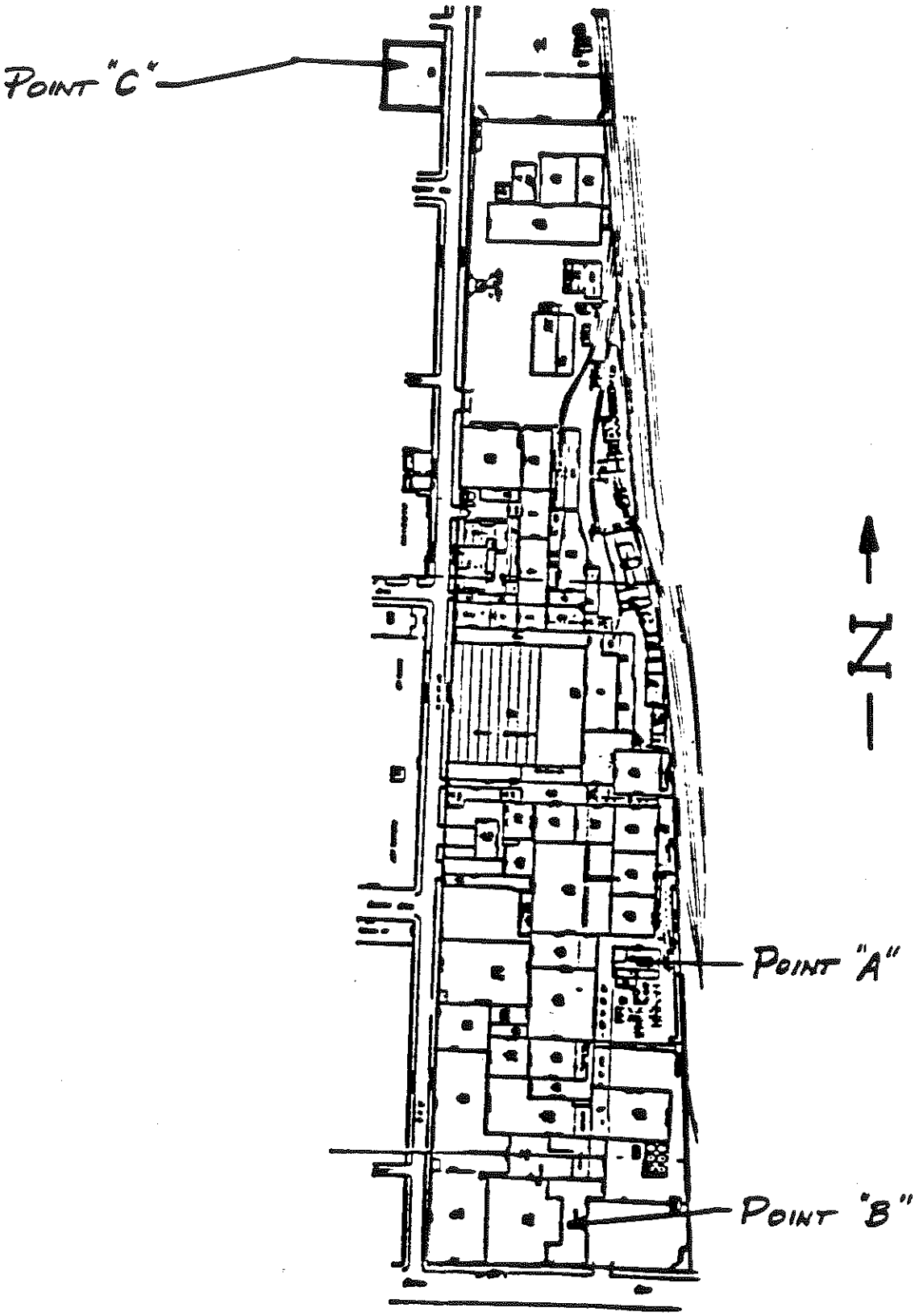
(1) EP toxicity - exceeds the maximum allowable chromium concentration

(d) The limestone sump plating residue is a listed hazardous waste - F006, and carries an assigned Systech Hazardous Waste number of STC 14-5067.

(e) Cyanide nor any other reactive waste material cannot enter this process waste.

FIGURE 6a

DATE: February 4, 1983
REVISION NO.: 0



APPROX. SCALE: 1" = 834 FT.

DATE: September 30, 1982
REVISION NO: 0

STILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-4385

BORDEN INC.-COLS. COATED FABRICS
1280 N. GRANT AVE.
COLUMBUS, OHIO
BILL ILG

LAB NO. 112
JOB 92-5033-24
DATE DEC. 16, 81

LOCATION COLLECTED BORDEN SOLVENT STILL BOTTOMS - SOLID FORM

PRESERVATIVES USED -

DATE COLLECTED - - - DEC. 2, 81

TIME COLLECTED - - - 0000

FIELD PH - - - - - -

DATE RECEIVED - - - DEC. 3, 81

TEST	VOL. (ML)	DILTN FACT.	RESULT	UNIT
IGNITABILITY			54 130	C/F
ARSENIC			<0.005	MG/L
BARIUM			1.5	MG/L
CADMIUM			<0.1	MG/L
CHROMIUM			0.7	MG/L
LEAD			7.9	MG/L
MERCURY			<0.0005	MG/L
SELENIUM			<0.005	MG/L
SILVER			<0.1	MG/L

PROJECT MANAGER

(THOMAS A. FILIPPO)

DATE: September 30, 1982
REVISION NO: 0

STILSON LABORATORIES, INC.
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-4385

BORDEN INC.-COLS. COATED FABRICS
1260 N. GRANT AVE.
COLUMBUS, OHIO
BILL ILG

LAB NO. 132
JOB 92-5033-26
DATE FEB. 18, 82

LOCATION COLLECTED CCF28 LIQ. STILL BOT.

PRESERVATIVES USED -

DATE COLLECTED - - - FEB. 1, 82

TIME COLLECTED - - - 0000

FIELD PH - - - - - -

DATE RECEIVED - - - FEB. 2, 82

TEST	VOL. (ML)	DILTN FACT.	RESULT	UNIT
CORROSIVITY				PH-SU
IGNITABILITY			<22 72	C/F
ARSENIC			<0.005	MG/L
BARIUM			<1.0	MG/L
CADMIUM			2.4	MG/L
CHROMIUM			0.22	MG/L
LEAD		10	14.0	MG/L
MERCURY				MG/L
SELENIUM			<0.005	MG/L
SILVER			<0.1	MG/L

PROJECT MANAGER Thomas D. Flippo
(THOMAS D. FLIPPO)

DATE: September 30, 1982
REVISION NO: 0

Stilson Laboratories, Inc.

Columbus and Cleveland, Ohio

ADDRESS REPLY TO: 170 N. HIGH ST. COLUMBUS, OHIO 43215
PHONE: 614/228-4388

E.P. TOXICITY
40 CFR 261.24

Client: Borden, Inc.
Columbus Coated Fabrics
1280 Grant Avenue
Columbus, Ohio 43201
Attn: Bill Ilg

Lab Number 8450
Job Number 92-5033-19
Date Reported 12/3/80

Location Collected Borden-PC 3 DUST STOP OIL AND PLASTICIZER RESIDUE
Date Collected 11/19/80
Date Received 11/19/80

EPA Hazardous Waste No.	Contaminant	Result milligrams/liter	Maximum Concentration milligrams/liter
D004	Arsenic		5.0
D005	Barium	80.	100.0
D006	Cadmium	6.0	1.0
D007	Chromium	< .1	5.0
D008	Lead	2.2	5.0
D009	Mercury		0.2
D010	Selenium		1.0
D011	Silver		5.0
D012	Endrin		0.02
D013	Lindane		0.4
D014	Methoxychlor		10.0
D015	Toxaphene		0.5
D016	2,4-D		10.0
D017	2,4,5-TP Silvex		1.0

DATE: September 30, 1982

STILSON LABORATORIES, INC
170 NORTH HIGH STREET
COLUMBUS OHIO 43215
PHONE - 614-228-4385

REVISION NO: 0

DOLS. COATED FABRICS-BORDEN, INC
P.O. BOX 208
COLUMBUS, OHIO 43216
ACCOUNTS PAYABLE

LAB NO. 48
JOB 92-5033-24
DATE AUG. 31, 81

LOCATION COLLECTED LIMESTONE SUMP CCF-23

PRESERVATIVES USED -

DATE COLLECTED - - - JULY 27, 81

TIME COLLECTED - - - 0000

FIELD PH - - - - - -

DATE RECEIVED - - - AUG. 7, 81

TEST	VOL. (ML)	DILTN FACT.	RESULT	UNIT
ARSENIC			<0.005	MG/L
BARIUM			<1.0	MG/L
CADMIUM			<0.1	MG/L
CHROMIUM			11.6	MG/L
LEAD			<0.1	MG/L
MERCURY			<0.0005	MG/L
SELENIUM			<0.005	MG/L
SILVER			<0.1	MG/L

PROJECT MANAGER Thomas A. Flippo (GLH)

(THOMAS A. FLIPPO)

ATTACHMENT 1

ATTACHMENTS A-B

COLUMBUS COATED FABRICS
(OHD 004 294 351)

Solids Test

A stick is pushed into the material and removed. If any free liquid drips off the stick after removal, it is considered liquid. If the stick is dry or the sludge is of mayonaise consistency, the material is considered solid. If a small quantity of free liquid exists, absorbent material and/or ashes are added and stirred into the sludge until it is determined by the stick test the material is solid.

This test is as prescribed by the landfill operator (CECOS Inc., Williamsburg, Ohio).

Procedure

1. Clean trier.
2. Insert trier into waste material 0 to 45° from horizontal. Rotate trier to cut a core of the waste. Remove trier with concave side up and transfer sample to container.

1.2.1.6 Auger

Scope and Application

An auger consists of sharpened spiral blades attached to a hard metal central shaft. An auger samples hard or packed solid wastes or soil.

Apparatus

Augers are available at hardware and laboratory supply stores.

Procedure

1. Clean sampler.
2. Bore a hole through the middle of an aluminum pie pan large enough to allow the blade of the auger to pass through. The pan will be used to catch the sample brought to the surface by the auger.
3. Place pan against the sampling point. Auger through the hole in the pan until the desired sampling depth is reached. Back off the auger and transfer the sample in the pan and adhering to the auger to a container. Spoon out the rest of the loosened sample with a sample trier.

1.2.1.7 Scoop and Shovel

Scope and Application

Scoops and shovels are used to sample granular or powdered material in bins, shallow containers and conveyor belts.

Apparatus

Scoops are available at laboratory supply houses. Flat-nosed shovels are available at hardware stores.

Procedure

1. Clean Coliwasa.
2. Adjust sampler's locking mechanism to ensure that the stopper provides a tight closure. Open sampler by placing stopper rod handle in the T-position and pushing the rod down until the handle sits against the sampler's locking block.
3. Slowly lower the sampler into the waste at a rate that permits the level of liquid inside and outside the sampler to remain the same. If the level of waste in the sampler tube is lower inside than outside, the sampling rate is too fast and will produce a nonrepresentative sample.
4. When the sampler hits the bottom of the waste container, push sampler tube down to close and lock the stopper by turning the T-handle until it is upright and one end rests on the locking block.
5. Withdraw Coliwasa from waste and wipe the outside with a disposable cloth or rag.

INSPECTION SCHEDULE - CCF

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Safety & emergency equipment	Sand	Out of stock	Weekly/as needed
	Portable sump pump	Availability; functional	Weekly
	Telephone	Functional	Daily
	Fire Hose	Leaks; water pressure	Daily
	Sprinkler system	Leaks; water pressure	Daily
	Emergency shower	Leaks; functional; water pressure	Weekly
	First aid equipment and supplies	Items out of stock	Weekly
Security devices	Facility fence	Damage to chain link structure	Weekly
	Container storage bldg. door	Damage to structure	Daily
Operating and structural equipment	Solvent still and related equipment	Sump freeboard; leaks in system	Daily
Container storage area	Container placement and stacking	Unobstructed aisle space; height of stacks; segregation of waste types	Daily
	Sealing of containers	Drums without lids; loose lids	Daily
	Labeling of containers	Improper identification	Daily
	Containers	Corrosion; leakage; structural defects	Daily
	Pallets	Damaged	Daily
	Base or foundation, ramp	Severe cracks or deterioration; settling	Daily
	Sump area	Debris; deterioration	Daily
	Warning signs	Damaged; obstructed	Daily
	Waste storage bldg.	Roof, window integrity	Daily
	General waste storage area	Debris; unlabeled drums; drums out of place; obstructions to normal drum handling	Daily
	Brass or bronze tools	Availability; functional	Weekly
Loading/unloading dock	Spill control sand	Out of stock	Daily
	Obstructions to drum handling	Debris; standing obstructions, snow, ice, wet or oily surfaces	Weekly
	Barrel truck	Functional	

(g) The off-site treatment and disposal facilities to which waste will be taken, are as follows:

Disposal

CECOS International, Inc.
Williamsburg, OH
EPA ID# OHD087433744

Incineration

Ross Incineration Services
Grafton, OH
EPA ID# OHD048415665

Treatment (Liquids)

Systech Liquid Treatment Corporation
Hillard, OH
EPA ID# OHD081290611

(h) Transporters of the waste will be:

Acme Liquid Waste
Westerville, OH
EPA ID# OHD000772723

CECOS (Cer) Transport
Cincinnati, OH
EPA ID# OHD087433744

Ross Transportation Services
Grafton, OH
EPA ID# OHD980614374

U.S. EPA Hazardous Waste Number	Hazardous Waste Description
D006	Dust stop waste
F002	Spent halogenated solvents, such as methylene Chloride and 1,1,1 trichloroethane
F003	Spent non-halogenated solvents, such as cychlohexanone
F005	Still bottoms from recovery of spent non-halogenated solvents
F006	Electroplating sludge

EMERGENCY BRIGADE

a. Immediately following the fire alarm or reporting of an emergency, members of the Emergency Brigade will report to the emergency area to execute orders under the direction of the ranking Brigade member.

b. Members of the Emergency Brigade with special assignments shall proceed to their assigned posts and execute the special duties and remain there until relieved by Brigade Chief unless otherwise instructed.

1. Sprinkler valves

2. Gate men

c. The Emergency Brigade will fight fires in the incipient stages only. Upon the arrival of the City Firemen and equipment, Emergency Brigade members shall be relieved of fire fighting duties.

d. The Emergency Brigade will assist in salvage and clean up duties and other assignments as directed by the operating foreman to minimize danger and loss.

e. A Brigade member shall be designated to meet emergency fire equipment at gate nearest to emergency area.

SECURITY GUARDS

a. Guards will announce the arrival of City Fire Equipment and Emergency Squads and direct equipment to plant entrance nearest the emergency area.

b. Guards will permit only authorized personnel and emergency vehicles to enter the plant.

c. Guards, when authorized by supervision, will call persons as listed on the Emergency Call list.

d. Guards will remain at the phone in the Main Gate House to assure all areas receive the emergency call.

e. All media representatives shall be directed to the Personnel Manager.

Attachment B-10

STORAGE AREA CRITERIA

1. The entire Hazardous Waste Storage Building is separate from the main factory complex by a concrete roadway in the west side and a concreted area approximately 15 ft wide on the north side.
2. The Hazardous Waste Storage Building is protected from fire by a wet sprinkler system. The sprinkler system heads are located for a coverage in excess of "high hazard protection" (a maximum of 69 sq ft of floor space per sprinkler head).
3. In addition to the sprinkler system, a 1½ inch, 75 foot wall mounted fire hose reel is available connected to the internal fire system of the facility. This is located directly across the roadway west of the Hazardous Waste Storage Building. This hose will reach to the center of the Storage Building.
4. The storage building is easily accessible for fire fighting vehicles and equipment for both City fire fighting equipment and the plant fire brigade. See Map Pg. 66a for Access Route. The fire brigade will fight any fire until outside assistance has arrived.

ATTACHMENT 2

ADDENDA A-C

COLUMBUS COATED FABRICS
(OHD 004 294 351)

ADDENDUM A

GENERATOR RECORDKEEPING

COLUMBUS COATED FABRICS (OHD 004 294 351)

40 CFR 262.40; 40 CFR 268.7(a)(6)

Does CCF keep copies of the following generator documents for three years unless otherwise noted, or longer if required by unresolved enforcement action or requested by the Regional Administrator:

1. Manifests with receiving facility signature? (262.40(a) and (d))

   Yes _____ No _____

2. Biennial Reports (large quantity generator only)? (262.40(b) and (d))

   Yes _____ No _____ NA _____

3. Exception Reports (large quantity generator only)? (262.40(b) and (d))

   Yes _____ No _____ NA _____

4. Records of test results, waste analyses, or any other waste determinations made pursuant to 262.11? (262.40(c) and (d))

   Yes _____ No _____

5. LDR notifications, certifications, waste analysis data, and other supporting documentation (retain for five years) (268.7(a)(6))

   Yes _____ No _____

Additional Comments: _____

ADDENDUM B
RCRA LAND DISPOSAL RESTRICTIONS
COLUMBUS COATED FABRICS (0HD 004 294 351
40 CFR PART 268

I. WASTE IDENTIFICATION

A. Waste Code Determination

Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic which is not addressed in the listing? [40 CFR 268.9(a); 40 CFR 262.11(c)]

Yes ___ No ___ NA ___

If No, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____
_____	_____

B. Does the facility handle the following wastes (national capacity variances)?

1. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

   Yes ___ No ___ List _____

2. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

   Yes ___ No ___ List _____

3. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

   Yes ___ No ___ List _____

4. Inorganic solid debris as defined in 40 CFR 268.2(g); includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

   Yes ___ No ___ List _____

5. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

   Yes ___ No ___ List _____

6. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92). [40 CFR 268.35(d)]

   Yes ___ No___ List _____

Section I. Comments:_____

_____

II. STORAGE FACILITY REQUIREMENTS

A. Waste Analysis

1. Has CCF amended their waste analysis plan to address LDR treatment standards? [40 CFR 264.13(b)]

   Yes _____ No _____

   Note date of most recent amendment:_____

   Note: Questions 2-4 apply both to incoming waste shipments and wastes generated on site. These analyses are not required for wastes manifested off site as exceeding treatment standards as long as they are correctly identified.

2. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP), or the extraction procedure if allowed? [40 CFR 268.40; 40 CFR 264.13(a)(1&2)]

   Yes ___ No ___ NA ___

3. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis? [40 CFR 268.40; 40 CFR 264.13(a)(1&2)]

   Yes ___ No ___ NA ___

4. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

   Yes ___ No ___ NA ___

   Section II.A. Comments:_____

   _____

B. Operating Record

Note: Records are to be retained until closure.

1. Does the operating record contain records and results of LDR waste analyses? [40 CFR 264.73(b)(3)]

   Yes ___ No ___

2. Does the operating record contain copies of generator LDR notifications and certifications? [40 CFR 264.73(b)(15)]

   Yes ___ No ___

   Section II.B. Comments:_____

   _____

C. Storage

1. Containers

a. Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes _____ No _____

b. Have wastes been stored for less than one year since the appliable LDR treatment standards went into effect? [40 CFR 268.50(a)(2)(i)]

Yes _____ No _____

If Yes, check here _____ and go to question 2.

c. Can the facility show that storage over one year is necessary to facilitate proper treatment, recovery, or disposal? [40 CFR 268.50(c)]

Yes _____ No _____

2. PCB Storage

a. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes _____ No _____

If No, check here ____ and go to section D.

b. Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes _____ No _____

c. Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes _____ No _____

Section II.C. Comments: _____

_____

D. **Dilution Prohibition:**

1. Are prohibited wastes with different treatment standards mixed?

Yes ___ No ___

2. If Yes, are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___ NA ___

Section II.D. Comments: _____

_____

E. **RCRA Exempt Treatment**

1. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are

managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ___

2. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met? [40 CFR 268.9(d)]

Yes ___ No ___ NA ___

Section II.E. Comments: _____

_____

F. **Off-Site Management:**

1. Shipments to Treatment or Storage Facilities

Note: Wastes subject to variances or extensions are addressed in checklist section F.3.

a. Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ___ No ___

If No, check here ____ and go to question 2.

b. Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___

c. If alternative treatment standards are specified for lab packs, is the required certification included with the notification? [40 CFR 268.7(a)(7) or (8)]

Yes ___ No ___ NA ___

2. Shipments to Disposal Facilities

a. Are wastes shipped to off-site Subtitle C disposal facilities?

Yes ___ No ___

If No, check here ____ and go to question 2.d.

b. Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)]

Yes ___ No ___

c. If alternative treatment standards are specified for lab packs, is the required certification included with the notification? [40 CFR 268.7(a)(7) or (8)]

Yes ___ No ___ NA ___

d. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___

If No, check here ____ and go to question 3.

e. Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 2)]?

Yes ___ No ___

3. Wastes Subject to Variances, Extensions, or Petitions

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ___

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ___ No ___ NA ___

Section II.F. Comments:_____

_____

G. **Additional Comments, Concerns, or Issues:** _____

ADDENDUM C
WASTE MINIMIZATION
COLUMBUS COATED FABRICS (OHD 004 294 351)
40 CFR 264.73(b)(9)

1. Does CCF certify, at least annually, that they have a program to reduce the volume and toxicity of hazardous wastes generated at the facility?

   Yes _____ No _____

2. Does the certification include a statement that the method of treatment or storage is the practicable method currently available which minimizes present and future threats to human health and the environment?

   Yes _____ No _____ NA _____

3. Describe waste minimization efforts below:

   a. Container Storage Area: _____

   b. Other Activities: _____

   Additional Comments: _____

ATTACHMENT 3

Testimony for Columbus Coated Fabrics Public Hearing

July 25, 1984

Time: 7:00 P.M.

Location: 97 S. Grant Avenue, Columbus Main Library

In October of 1982, Columbus Coated Fabrics made application to the United States Environmental Protection Agency to establish a hazardous waste storage facility for still bottom waste, dust stop oil, plasticizer residue, and plating pit sludge at its 1280 North Grant Avenue business in Columbus. The U.S.E.P.A. has reviewed this application and determined that it appears to comply with U.S.E.P.A. rules and the application appears to meet the performance standards set forth in Title 40 Part 264. Columbus Coated Fabric's application has also been reviewed by the Environmental Health Division of the Columbus Health Department and other appropriate agencies. In our review we have developed some concerns regarding the protection of the health, safety, and well being of the surrounding community.

Although we are aware of the large quantities of hazardous materials stored at this facility current federal and state laws and this application deals only with hazardous wastes. Therefore our comments are directed solely toward the storage of hazardous waste at this site. Our review of this application has highlighted several deficiencies which we believe must be addressed before a final permit is granted. First, Part 264.37 states that "the owner or operator must attempt to make the following arrangements...(1) arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards... and (2) arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illness which could result from fires, explosions, or releases at the facility". Although letters of transmittals along with the pertinent sections of the application have been submitted to the above mentioned agencies, to our knowledge no formal arrangements have been agreed upon by these agencies and the applicant as required by Part 264.52. Secondly, the Division of Sewers and Drains from Columbus have expressed concerns about the containment procedures in the event of a spill outside the hazardous waste storage building. Among the questions raised are the following: (1) is the amount of stored emergency material for such spills adequate for containment, (2) can the manhole in the street where such a spill would be contained be sealed to prevent entry into the city's sewer system, and (3) are there other options available for spill containment? Although the applicant

041-53

states that evacuation of nearby residents is not needed in the event of an emergency at this facility, this department believes that such is not the case. Residential property is within 1000 feet of the site and evacuation procedures might need to be initiated in the event of a fire or an explosion. In addition, three schools are within one kilometer of the plant, their evacuation would be difficult under emergency conditions due to dependence upon public transportation. Lastly, Part 264.16(d) requires "a written description of the type and amount of both introductory and continuing training that will be given to each person filling a hazardous waste management position". This information is lacking in the application.

I would like to address our recommendations at this time. First, the Columbus Health Department desires that an inspection of the site is performed on a quarterly basis. Such a program, whether performed by the Columbus Fire Department, which has agreed to perform this inspection, the U.S.E.P.A., or our department, would help to insure that incompatible wastes would not be stored in close proximity to each other and that the stored containers would be in good condition. Secondly, we recommend that a health assessment survey of the surrounding community be conducted in the event of a fire or an explosion. The extent of any acute exposure from such an incident could then be determined. In addition we recommend environmental monitoring to be performed if a fire or spill does occur. The monitoring might include sampling the air, soil, or water surrounding the site depending on the type and seriousness of the fire or spill. To prevent the contamination of both ground water and public water supplies by the storage of hazardous waste at Columbus Coated Fabrics, we recommend that the Columbus Division of Water in cooperation with Columbus Coated Fabrics conduct a cross connection survey for the facility. We also request that the previously mentioned application deficiencies be corrected or addressed before a final permit is issued. Specifically, we recommend that (1) the contingency plan include the arrangements agreed to by local police departments, fire departments, and hospitals as required in Part 264.52, (2) the Division of Sewers and Drains be contacted to discuss other options other than the storm sewer system for spills, (3) Columbus Coated Fabrics acknowledge possible need for evacuation plan of residents, and (4) the application contain a written description of the type and amount of training given to each hazardous waste management personnel as required in Part 264.16. The Columbus Health Department also recommends that Columbus Coated Fabrics notifies the Division of Fire in the event of a spill of 25 gallons or more of a flammable hazardous waste so as to

reduce response time to any emergency. Finally we request that an extension of time be granted for the written comment period as cited in Part 124.12 of Title 40. This extension is needed to perform a thorough review of the application since a copy of the application was not received by our office until July 9, 1984.

In conclusion, the Columbus Health Department believes that an inspection program coupled with detailed contingency plans will help to minimize any adverse impact to the surrounding community. We also request that the above conditions be incorporated within a Memorandum of Understanding between the City of Columbus and the applicant. However if the U.S.E.P.A. does not place these conditions on the permit, then we will oppose the permit and request that it be denied.

ATTACHMENT 4

EPA ID No# OHD 004-294-351
Date:
SEP 27 1984

RESPONSE TO COMMENTS REGARDING THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) HAZARDOUS WASTE MANAGEMENT FACILITY PERMIT TO BE ISSUED TO COLUMBUS COATED FABRICS COLUMBUS, OHIO

INTRODUCTION

This response is issued pursuant to 40 Code of Federal Regulations (CFR) Section 124.17, which requires that any changes of draft permit conditions be specified along with the reason for the change; that all significant comments be described and responded to; and that any documents cited in this response be included in the administrative record.

The public comment period commenced June 20, 1984, with public notice in the Columbus Dispatch, as well as radio announcements on local stations. The notice and announcement requested public comments on the draft RCRA permit for Columbus Coated Fabrics. In addition, the public notice and radio announcement stated that a public hearing would be held on July 25, 1984, at the Columbus Public Library. As a result of requests from the public, the comment period was extended to August 27, 1984. In addition to the comments presented at the hearing, written comments were accepted through August 27, 1984.

COMMENTS AND RESPONSES

COMMENT

Some commenters stated that the facility's application lacked a written description of the type and amount of training given to persons occupying hazardous waste management positions.

RESPONSE

Review of the application indicates that job titles for positions at the facility which are related to hazardous waste management, as well as names of employees occupying various positions, are present. In addition, the application contains responsibilities and duties for various hazardous waste management positions. Also, descriptions of the type and amount of introductory and continuing hazardous waste training given to employees are present in the application. Therefore, the personnel training portion of the application satisfies the requirements of 40 CFR 264.16(d).

COMMENT

Some commenters stated that the Contingency Plan should include the arrangements agreed to by local police departments, fire departments, and hospitals.

RESPONSE

In order to familiarize the local fire, police, and hospital representatives with the properties of the hazardous waste handled by by the facility, as well as fire and emergency evacuations routes at the facility, a copy of the contingency plan was submitted to each of these organizations by Columbus Coated Fabrics. In addition, any updates of the contingency plan will be forwarded to these organizations. Also, recent conversations between this Agency and representatives of Columbus Coated Fabrics indicated that members of the Columbus Fire Department visit the facility every six months for familiarization and/or inspection purposes. Since the provisions of 40 CFR 264.37 do not require that agreements be signed with the police and fire departments when a single police and single fire department might respond to an emergency, the regulatory requirements have been satisfied.

COMMENT

Some commenters stated that the facility's contingency plan should consider evacuation of residences and schools which are located within a kilometer of the facility.

RESPONSE

There is no regulatory requirement for Columbus Coated Fabrics to include an evacuation plan for residences and schools in its contingency plan. The requirements imposed by 40 CFR 264.51(b) were satisfied by the facility when it included an evacuation plan for facility personnel in its contingency plan.

COMMENT

One commenter expessed concerns about the facility's containment procedures in the event of a spill outside the hazardous waste storage building.

RESPONSE

The facility's contingency plan specifies that in the event of a spill of hazardous materials from one of the plating tanks (other than the cyanide tank), the drain into the sump would be plugged and the liquid will drain into the underfloor trench. Thus, eventual discharge into the sanitary sewer would be prevented. Afterwards, the liquid wastes would be pumped from the trench into drums by maintenance personnel. If the cyanide tank were the source of a spill, liquid would drain into the curbed area surrounding the tank. Afterwards, the liquid wastes would be pumped from the curbed area into drums.

In the case of a spill outside of the hazardous waste storage building, there are three locations at which sand and shovels are located for use in spill containment. In the case of entry of wastes into the storm sewer system, the City of Columbus would be notified; the outfall would be monitored, as necessary. The type and amount of available emergency equipment is considered sufficient. In addition, the procedures which would be implemented in the event of a spill are considered acceptable and proper.

COMMENT

Some commenters recommended that quarterly inspections be performed at the facility by Ohio EPA, U.S. EPA and/or the Columbus Health Department.

RESPONSE

Inspection on an annual basis by either the Ohio EPA Or this Agency is consistent with this Agency's guidance regarding inspections of facilities having an RCRA permit. There is no regulatory basis for including in the permit a requirement for a quarterly inspection of the facility by the Columbus Health Department or its representative.

COMMENT

Some commenters opposed issuance of the permit based on anxiety regarding storage of hazardous wastes in their community.

RESPONSE

Comments of this notice are not within the scope of RCRA regulations, which focus on technical design of the facility as well as proper procedures for safe operation and maintenance of the storage area.

COMMENT

A commenter questioned whether proper notice had been given regarding the date, time, and location of the public hearing held on July 25, 1984, concerning the draft RCRA permit.

RESPONSE

The Resource Conservation and Recovery Act requires the Agency to notice its intent to issue or deny a permit in a major local newspaper, to broadcast it over a local radio station, and to provide an opportunity for a public hearing. On June 20, 1984, U.S. EPA published a public notice in the Columbus Dispatch. The notice announced that a public hearing would be held on July 25, 1984, at the auditorium of the Columbus Public Library. The hearing would commence at 7:00 p.m. and would continue until all persons that had registered to speak have had an opportunity to present their comments for the record. In addition, the public notice announced the availability for public inspection of Columbus Coated Fabrics' permit application and draft RCRA permit. Radio stations WFRD-AM and WBNS-AM broadcasted a notice of the hearing on June 20, 1984. Thus, proper public notice of the Agency's intent to hold a public hearing on July 25, 1984 was done, and the requirements of 40 CFR 124.10(b) were met.

DETERMINATION

The United States Environmental Protection Agency (U.S. EPA) has determined that the permit will be issued without any change in permit conditions from those which were public noticed.

ATTACHMENT 5

CERTIFICATE OF MAILING

I Michael Chan, a duly authorized representative of the United States Environmental Protection Agency, Region V, do hereby certify that on October 3, 1984, I placed in the United States mail, at the mail chute at 230 South Dearborn, the Final Permit Decision for the Columbus Coated Fabrics facility in Columbus, Ohio. The Final Permit Decision was mailed to the persons specified on the attached mailing list.

Dated: 10/3/84

Michael P. Chan

Receipts of certified mailing will be included in A.R. as received within 10/31

047-69

CERTIFICATE OF MAILING

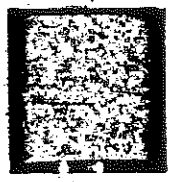
I Michael Chan, a duly authorized representative of the United States Environmental Protection Agency, Region V, do hereby certify that on October 3, 1984, I placed in the United States mail, at the mail chute at 230 South Dearborn, the Final Permit Decision for the Columbus Coated Fabrics facility in Columbus, Ohio. The Final Permit Decision was mailed to the persons specified on the attached mailing list.

Dated: 10/3/84

Michael P. Chan

Receipts for certified mailing will be included in AR as received

047-69

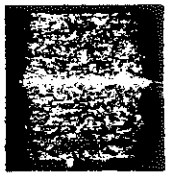


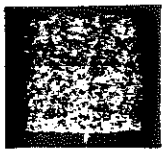
James Mentel

non-responsive

non-responsive

non-responsive





William G. Ilg
Senior Project Engineer
Colombos Coated Fabrics
Borden Chemical, Borden Inc.
1280 N. Grant Ave.
Columbus, OH 43216

Facility contact

ATTACHMENT 6

DATE: November 21, 1983

REVISION NO. 2

X - LETTERS OF TRANSMITTAL

In order to familiarize the local fire, police and hospitals on the properties of the wastes handled and the fire and emergency access routes, the contingency plan has been submitted to these aforementioned agencies. As any updates of the contingency plan, as initiated, they will be forwarded to these agencies.

The following letters indicate the submission of contingency and emergency evacuation plans in order to fulfill coordination agreement requirements.

The hazards represented by the wastes handled and the potential exposure to these hazards are of particular value to the agencies receiving the contingency plan. This information is located on pages 62a, 62b, 62c, 62d, 62e, and 62f.

ATTACHMENT 7

SECTION IV - DEVELOPMENT OF A DISCHARGE CONTINGENCY PLAN TO BE FOLLOWED IN EVENT OF AN UNAVOIDABLE SPILL.

*A. Notification Procedure. (For additional information, see Pg. No. 64)

1. Columbus Coated Fabrics - Division of Borden Chemical
   a. W. L. Orr - Safety Director (Emergency Coordinator)
   b. S. E. Liser - Plant Manager
   c. M. E. Mavse - Emergency Brigade Chief
   d. L. T. Poteet - Maintenance Superintendent
   e. S. W. Morris - Director of Project Engineering
   f. D. H. Bibb - Supervisor & Chief of the Emergency Squad

2. Borden Company
   a. Operation Alert - 614-457-5200

3. State Agencies
   a. Ohio EPA Emergency Response Number
      2244-46 South Hamilton Road
      Columbus, Ohio 43227
      466-6542
      Ask for Hazardous Waste Section, Debbie Unger
   b. Ohio EPA Emergency Spill
      466-8508
   c. Ohio EPA Emergency Response
      361 East Broad Street
      Columbus, Ohio 43216
      466-6542

4. Governmental Agency
   a. National Response Center
      800-424-8802

5. City of Columbus Emergency Aid
   a. Columbus Fire Department
      221-2345

      The Columbus Fire Department inspects the facility once a year and checks out emergency equipment.

   b. Columbus Emergency Squad
      221-2345

      The emergency squad takes injured to a hospital determined after arrival at the plant.

   c. Columbus Police Department
      462-4545

*Revised February 24, 1982

ATTACHMENT 8

RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: William Ely
Columbus Coated Fabrics

FROM: Charles B Alexander
USEPA

DATE 9/10/84

TIME Am

SUBJECT Proposed RCRA permit for facility

SUMMARY OF COMMUNICATION

This call was placed to inquire about the contingency plan included with the company's application for an RCRA permit. Specifically, I asked about the arrangements made with the fire department. Mr. Ely stated that the Columbus Fire Dept was sent a copy of the contingency plan, and that a representative of the Fire Dept visits the facility every six (6) months and walks through the plant.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES
TO:

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-8 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

041-60

ATTACHMENT 9

5HS-13

JAN 18 1985

Police Chief
City of Columbus
120 West Gay Street
Columbus, Ohio 43215

RE: Receipt of Contingency Plan
from Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio

Dear Sir:

The purpose of this letter is to request clarification regarding the extent of coordination between your organization and Columbus Coated Fabrics for their hazardous waste storage facility located at the above-referenced address. Specifically we are interested in determining the approximate date on which your organization received a copy of Columbus Coated Fabric's contingency plan, as well the date or dates when copies of revisions to the plan were received. Also, please provide information to this office concerning the frequency and extent of visits to Columbus Coated Fabrics by representatives of your organization for either familiarization or inspection purposes.

The above information is needed in order to process the petition for review of the find permit decision for this facility. This petition was filed by the Columbus Health Department on November 2, 1984.

If you have any questions regarding this request for information or desire additional information please contact Charles Slaustas of my staff using either this Region's toll-free number (800) 621-3431 or his direct number: (312) 886-6190.

Sincerely,

Edith H. Ardiente, P.E.
Chief, Technical Programs Section

cc: Eileen A. Graves
Assistant City Attorney
City of Columbus

William E. Ilg
Columbus Coated Fabrics

bcc: [redacted], ORC

ATTACHMENT 10

5HS-13

JAN 1 8 1985

Fire Chief
Division of Fire
200 Greenlawn Avenue
Columbus, Ohio 43223

RE: Receipt of Contingency Plan
from Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio

Dear Sir:

The purpose of this letter is to request clarification regarding the extent of coordination between your organization and Columbus Coated Fabrics for their hazardous waste storage facility located at the above-referenced address. Specifically we are interested in determining the approximate date on which your organization received a copy of Columbus Coated Fabric's contingency plan, as well the date or dates when copies of revisions to the plan were received. Also, please provide information to this office concerning the frequency and extent of visits to Columbus Coated Fabrics by representatives of your organization for either familiarization or inspection purposes.

The above information is needed in order to process the petition for review of the final permit decision for this facility. This petition was filed by the Columbus Health Department on November 2, 1984.

If you have any questions regarding this request for information or desire additional information please contact Charles Slaustas of my staff using either this Region's toll-free number (800) 621-8431 or his direct number: (312) 886-6190.

Sincerely,

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

cc: Eileen A. Graves
Assistant City Attorney
City of Columbus

[redacted]
Columbus Coated Fabrics

bcc: Roger Grimes, ORC

ATTACHMENT 11

5HS-13

JAN 18 1985

Administrator
Grant Hospital
300 East State Street
Columbus, Ohio 42153

RE: Receipt of Contingency Plan
from Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio

Dear Sir:

The purpose of this letter is to request clarification regarding the extent of coordination between your organization and Columbus Coated Fabrics for their hazardous waste storage facility located at the above-referenced address. Specifically we are interested in determining the approximate date on which your organization received a copy of Columbus Coated Fabric's contingency plan, as well the date or dates when copies of revisions to the plan were received. Also, please provide information to this office concerning the frequency and extent of visits to Columbus Coated Fabrics by representatives of your organization for either familiarization or inspection purposes.

The above information is needed in order to process the petition for review of the find permit decision for this facility. This petition was filed by the Columbus Health Department on November 2, 1984.

If you have any questions regarding this request for information or desire additional information please contact Charles Slaustas of my staff using either this Region's toll-free number (800) 621-8431 or his direct number: (312) 886-6190.

Sincerely,

Edith H. Ardiente, P.E.
Chief, Technical Programs Section

cc: Eileen A. Graves
Assistant City Attorney
City of Columbus

William G. Ilg
Columbus Coated Fabrics

D.C.: Roger Grimes, ORC

ATTACHMENT 12

ATTACHMENT 13

STATEMENT OF BASIS

Columbus Coated Fabrics
OHD004294351

This is a statement of the basis for the Draft Hazardous Waste Permit for the subject facility. It briefly describes the derivation of the conditions of the draft permit and the reasons for them. Under 40 CFR 124.7 (Title 40 of the code of Federal Regulations, Section 124.7), the Statement of Basis is sent to the applicant and to any other person who requests it.

A. FACILITY DESCRIPTION

1. RCRA Activities

Columbus Coated Fabrics is located in Columbus at 1280 North Grant Avenue. Columbus Coated Fabrics is primarily a manufacturer of decorative vinyl products. Hazardous wastes are generated from the manufacturing process as well as a solvent recycling operation. A small hazardous waste drum storage facility is operated to store the hazardous wastes generated at the facility prior to shipment off site for treatment or disposal.

2. Permit Actions Other Than RCRA

a. Water

Columbus Coated Fabrics does not require a National Pollutant Discharge Elimination System (NPDES) permit as all of their process and sanitary wastewater is discharged to the public sewer owned and operated by the City of Columbus. The facility discharges under a standard strength industrial discharge permit.

b. Air

Columbus Coated Fabrics has applied for and received Ohio air permits from the Central District Air Pollution Control Agency limiting the discharge of air emissions from two boilers and several point sources.

c. Other Federal Acts Considered

Columbus Coated Fabrics will not require other permits to satisfy any other Federal acts. The facility will not have an adverse effect on the historical, architectural, archeological or cultural characteristics of the properties either listed or eligible for listing on the National Register for Historical Places.

B. PERMIT APPLICATION

The permit application cited herein is the September 30, 1982 permit application as amended on February 4, 1983, May 6, 1983, September 30, 1983, October 21, 1983 and December 9, 1983.

C. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to afford the United States Environmental Protection Agency (U.S. EPA), interested citizens and other governmental agencies the opportunity to evaluate the ability of the applicant to comply with the applicable hazardous waste management requirements under the Resource Conservation and Recovery Act (RCRA). The U.S. EPA is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the Agency intends to require the Permittee to comply during the ten year duration of the permit.

D. PROCEDURES FOR REACHING A FINAL DECISION

Under Section 7004(b) of RCRA and 40 CFR §124.10, the public is given forty-five days to review the application and comment on the draft permit conditions prior to EPA taking any final permitting action on the application for a hazardous waste management permit. The comment period will begin on the date of publication of the public notice in a major local newspaper of general circulation. When the Regional Administrator of the U.S. EPA makes his final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. If none of the comments received requested a change in the draft permit conditions, the permit will become effective immediately upon issuance of the permit. If comments received during comment period requested changes in the draft permit conditions then the final permit will become effective thirty (30) days after service of notice of the decision or at a later date if review is requested under 40 CFR §124.19.

The issuance of a Hazardous Waste Permit will be coordinated by both U.S. EPA and the Ohio Environmental Protection Agency (OEPA). At this time each Agency has regulations which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste. If the State receives Phase II interim authorization for the hazardous waste program, the State will assume the administration of the Federal hazardous waste permitting program and this permit.

E. BRIEF SUMMARY OF THE PERMIT CONDITIONS

This Section provides a brief summary of the permit conditions in the draft permit. The column titled "Regulation" provides the regulatory authority for the permit condition specified in the column titled "Permit Condition."

Permit Condition	Subject	Regulation (40 CFR)
I. STANDARD CONDITIONS		
I.A.	Effect of Permit	§270.4 & 270.30(g)
I.B.	Permit Actions	§270.30(f), 270.41, §270.42, 270.43, §264.112 & 264.343(d)
I.C.	Severability	Standard Practice
I.D.1.	Duty to Comply	§270.30(a)
I.D.2.	Duty to Reapply	§270.30(b) & 270.10(h)
I.D.3.	Permit Expiration	§270.51
I.D.4.	Need to Halt or Reduce Activity not a Defense	§270.30(c)
I.D.5.	Duty to Mitigate	§270.30(d)
I.D.6.	Proper Operation and Maintenance	§270.30(e)
I.D.7.	Duty to Provide Information	§270.30(h) & 264.74(a)
I.D.8.	Inspection and Entry	§270.30(i)
I.D.9.	Monitoring and Records	§270.30(j)
I.D.10.	Reporting Planned Changes	§270.30(l)(1)
I.D.11.	(Not Used)	
I.D.12.	Anticipated Noncompliance	§270.30(l)(2)
I.D.13.	Transfer of Permits	§270.30(l)(3), 270.40 & 264.12(c)
I.D.14.	Compliance Schedules	§270.30(l)(5) & 270.33
I.D.15.	Twenty-Four Hour Reporting	§270.30(l)(6) & 264.56(d)(i)(j)
I.D.16.	Other Noncompliance	§270.30(l)(10)
I.D.17.	Other Information	§270.30(l)(11)
I.E.	Signatory Requirement	§270.11 & 270.30(k)
I.F.	Confidential Information	§270.12
I.G.	Not Used	
I.H.	Documents to be Maintained at Facility Site	§264.13(b), 264.16(d), §264.53(a), 264.122(a), §264.142(a), 264.73, §264.15(b)

Permit Condition	Subject	Regulation (40 CFR)
II. GENERAL FACILITY CONDITIONS		
II.A.	Design and Operation of Facility	§264.31
II.B.	Required Notice (Not Applicable)	
II.C.	General Waste Analysis	§264.13
II.D.	Security	§264.14
II.E.	General Inspection Requirements	§264.15
II.F.	Personnel Training	§264.16
II.G.	General Requirements for Ignitable, Reactive and Incompatible Waste	§264.17
II.H.	Location Standards (not applicable)	
II.I.1.	Required Equipment	§264.32
II.I.2.	Testing and Maintenance of Equipment	§264.33
II.I.3.	Access to Communications or Alarm System	§264.34
II.I.4.	Required Aisle Space	§264.35
II.I.5.	Local Authorities	§264.37
II.J.1.	Implementation of Contingency Plan	§264.51
II.J.2.	Copies of the Contingency Plan	§264.53
II.J.3.	Amendments to the Contingency Plan	§264.54
II.J.4.	Emergency Coordinator	§264.55
II.K.	Manifest System	§264.71, §264.72, §264.76, §270.30(l)(7), §270.30(l)(8)
II.L.1.	Operating Record	§264.73
II.L.2.	Biennial Report	§264.75, §270.30(l)(g)

Permit Condition	Subject	Regulation (40 CFR)
II.M.1.	Closure Performance Standard	§264.111
II.M.2.	Amendment to Closure Plan	§264.112(b)
II.M.3.	Notification of Closure	§264.112(c)
II.M.4.	Time Allowed for Closure	§264.113
II.M.5.	Disposal or Decontamination of Equipment	§264.114
II.M.6.	Certification of Closure	§264.115
II.N.	Closure Cost Estimate	§264.142
II.O.	Financial Assurance for Facility Closure	§264.143
II.P.	Liability Requirements	§264.147
II.Q.	Incapacity of Owners or Operators, Generators or Financial Institutions	§264.148

Permit Condition	Subject	Regulation (40 CFR)
III. STORAGE IN CONTAINERS		
III.A.	Waste Identification	§270.13(i)
III.B.	Condition of Containers	§264.171
III.C.	Compatibility of Wastes with Containers	§264.172
III.D.	Management of Containers	§264.173
III.E.	Containment	§264.175
III.F.	Special Requirements for Ignitable or Reactive Waste	§264.176
III.G.	Special Requirements for Incompatible Waste	§264.177

Permittee: Columbus Coated Fabrics
North Grant Avenue
Columbus, OH 43215

I.D. Number: OHD004294351
Permit Number

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to Columbus Coated Fabrics (hereafter called the Permittee), to operate a hazardous waste storage facility located in Columbus, Ohio, on North Grant Avenue, at latitude 39° 59' 23" and longitude 82° 59' 43".

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §270.32(c).)

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated September 30, 1982 as modified by subsequent amendments dated February 4, 1983, May 6, 1983, September 30, 1983 and October 21, 1983 (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.41, §270.42 and §270.43) and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of _____, and shall remain in effect until _____, unless revoked and reissued, or terminated (40 CFR §270.41 and .43) or continued in accordance with §270.51.

PERMIT INDEX

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement with Subtitle C of RCRA. Issuance of this permit does not convey property rights or any sort of any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated non-compliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such non-compliance is authorized by an emergency permit. Any permit non-compliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.

3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13 - 270.29) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from non-compliance with the conditions of this permit.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials or other documents as may be required by law, to:

   (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, Standard Methods of Wastewater Analysis or an equivalent method as specified in the attached Waste Analysis Plan.

(b) The Permittee shall retain records of all montioring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

(c) Records of the monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

(iv) The individuals who performed the analyses;

(v) The analytical techniques or methods used; and

(vi) The result of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

11. Certification of Construction or Modification. The Permittee may not commence storage of hazardous waste at the facility until:

(a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and

(b) (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.

12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in non-compliance with permit requirements.

13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the faciliy durings its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

14. Compliance Schedules. Reports of compliance or non-compliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any non-compliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

(a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.

(b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

(i) Name, address, and telephone number of the owner or operator;

(ii) Name, address, and telephone number of the facility;

(iii) Date, time, and type of incident;

(iv) Name and quantity of materials involved;

(v) The extent of injuries, if any;

(vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the non-compliance and its cause; the periods of non-compliance (including exact dates and times); whether the non-compliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the non-compliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all other instances of non-compliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in condition D.15.

17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.

F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.

G. Documents To Be Submitted Prior to Operation.

(1) List of emergency equipment, its location and its capabilities.

H. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

1. Waste analysis plan as required by 40 CFR 264.13 and this permit.

2. Personnel training documents and records as required by 40 CFR 264.16(d) and this permit.

3. Contingency plan as required by 40 CFR 264.53(a) and this permit.

4. Closure plan as required by 40 CFR 264.112(a) and this permit.

5. Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.

6. Operating record as required by 40 CFR 264.73 and this permit.

7. Inspection schedules as required by 40 CFR 264.15(b) and this permit.

GENERAL FACILITY CONDITIONS

A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

B. Required Notice.

1. The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.

2. When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.L.1.)

C. General Waste Analysis. The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment III.

D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(a), 264.14(b)(1) and 264.14(c).

E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment IV. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).

F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment V. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).

G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR 264.17(a).

H. Location Standards.

Not Applicable.

I. Preparedness and Prevention.

1. Required Information. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment VI as required by 40 CFR 264.32.

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency.

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.

4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35.

5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment VI, and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.

3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan as required by 40 CFR 264.54.

4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

K. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76.

L. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6) and (8).

2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.

M. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment VII.

2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.

3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.

4. Time Allowed for Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment VII. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment VII.

5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment VII.

6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.

N. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment ***** .

1. The Permittee must adjust the closure cost estimate for inflation within 30 days ater each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).

2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).

3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

O. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.

P. Liability Requirements. The Permittee shall demonstrate continuous compliance with 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs.

Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

III. STORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit:

F005	F006
F002	D006
F003	

The Permittee may store up to 24,750 gallons of waste in containers.

B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172.

D. Management of Containers. The Permittee shall manage containers as required by 40 CFR 264.173.

E. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR 264.175 as specified in the attached plans and specifications, Attachment VIII.

F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

G. Special Requirements for Incompatible Waste.

1. Prior to placing incompatible wastes or incompatible wastes and materials in the same container, the Permittee shall comply with 40 CFR 264.17(b) as specified in Attachment IX.

2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

3. The Permittee shall separate containers of incompatible wastes as indicated in the attached plans, Attachment IX, as required by 40 CFR 264.177(c).

4. The Permittee must document compliance with III.G. (1) and (2) as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II.L.1).

SIGNATURE PAGE

Signature: _____

Basil G. Constantelos, Director
Waste Management Division

Date: _____

0174T

B.1.4

RCRA FINAL PERMIT SIGN-OFF

PART I. BACKGROUND

FACILITY NAME: Columbus Coated Fabrics

FACILITY LOCATION: 1280 North Grant Street, Columbus, Ohio

RCRA ID NUMBER: OHD 004-294-351

TYPE OF PERMIT

X Storage	___ Treatment	___ Disposal
X Container	___ Tank	___ Injection Well
___ Tank	___ Surface Impoundment	___ Landfill
___ Waste Pile	___ Incinerator	___ Land Application
___ Surface Impoundment	___ Other (Detonation)	___ Surface Impoundment

PART II. REVIEW PACKAGE CONTENT

- X Final Permit w/Attachments
- X Responsiveness Summary
- X Letter to Applicant
- X Letter to Commentors
- X Administrative Record
- ___ _____

PART III. CONCURRENCES

	WASTE MANAGEMENT BRANCH	INITIALS	DATE	AGREE	DISAGREE
1.	TECH. PERMIT CONTACT, C. Slaustas	CBS	9/13/84	(X)	( )
2.	CHIEF, STATE TECHNICAL UNIT	KRS	9/14/84	(X)	( )
3.	CHIEF, TP&C SECTION	[illegible]	9/14/84	(X)	( )
3a.	Chief SPIS	[illegible]	~~9/12/84~~	(X)	
4.	CHIEF, WASTE MAN. BRANCH	KK	9/18/84	(✓)	( )
	OFFICE OF REGIONAL COUNSEL				
5.	ASSIST. REG. COUNSEL, Grimes	RLLLG	9/25/84	(X)	( )
6.	CHIEF, SOLID WASTE & EMER. RESPONSE BR.	MB	9/25	(X)	( )
7.	REGIONAL COUNSEL	_____	_____	( )	( )

PART IV. APPROVAL

	DIRECTOR, WASTE MANAGEMENT DIVISION	DAS	9/27/84	(✓) ( )

cc: Section Log
ORC

042-66

OK DAS

PERMIT INDEX

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-13

SEP 2 8 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William G. Ilg
Senior Project Engineer
Columbus Coated Facbrics
P.O. Box 208
Columbus, Ohio 43216

RE: Columbus Coated Fabrics
Columbus, Ohio
U.S. EPA ID# OHD 004-294-351

Dear Mr. Ilg:

Enclosed is a copy of the final Resource Conservation and Recovery Act (RCRA) permit for your facility at the above-referenced location. The effective date of the permit, as issued, is the date indicated on the cover page of the permit.

The duration of the permit is ten (10) years. However, the United States Environmental Protection Agency may modify, revoke, reissue or terminate this permit based on causes specified in 40 Code of Federal Regulations (CFR) Section 270.40 and 270.41.

You have the right to appeal any condition of the permit pursuant to 40 CFR Section 124.19. The failure of your company to meet any portion of the permit could result in civil and/or criminal penalties.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Steve White
Ohio Environmental Protection Agency

Peggy Vince
Ohio Hazardous Waste Facility Approval Board

Mr. Thomas Heaton, Borden Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
HAZARDOUS WASTE MANAGEMENT PERMIT

Name of Permittee: Columbus Coated Fabrics

Facility Location: 1280 North Grant Avenue, Columbus, Ohio

EPA Identification Number: OHD 004-294-351

Effective Date: 30 days after service of notice unless review requested under 40 CFR 124.19

Expiration Date: Ten (10) years after the effective date

Authorized Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC., §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (U.S. EPA) codified and to be codified in Title 40 of the Code of Federal Regulations, a permit is issued to Columbus Coated Fabrics (hereafter called the Permittee) to operate a hazardous waste storage and treatment facility located in Columbus, Ohio at latitude 39 degrees 59' 23" and longitude 82 degrees 59' 43". You are authorized to conduct the following hazardous waste management activities:

X Storage	___ Treatment	___ Disposal
X Container	___ Tank	___ Injection Well
___ Tank	___ Surface Impoundment	___ Landfill
___ Waste Pile	___ Incinerator	___ Land Application
___ Surface Impoundment	___ Other (Detonation)	___ Surface Impoundment

Applicable Regulations:

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

X 261	X 264, Subpart G	___ 264, Subpart K
X 262	X 264, Subpart H	___ 264, Subpart L
X 264, Subpart A-E	X 264, Subpart I	___ 264, Subpart O
___ 264, Subpart F	___ 264, Subpart J	X 270

Permit Approval:

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit (see 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the final permit application, as amended, (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.42 and §270.43) and potential enforcement action. The Permittee must inform U.S. EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

Issued this 27TH day of SEPTEMBER, 1984

by Basil G. Constantelos
Basil G. Constantelos, Director
Waste Management Division

PERMIT INDEX

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT I
Permit Conditions

Columbus Coated Fabrics
1280 North Grant Street
Columbus, Ohio

U.S. EPA ID#: OHD 004-294-351

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application, or other appropriate action.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.

3. Permit Expiration. The duration of this permit shall be ten (10) years from the effective date of the permit, in conformance with the provisions 40 CFR §270.50. This permit and all conditions herein will remain in effect beyond the permit's expiration date only under those circumstances specified in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

   (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

   (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

   (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

   (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, June 1982; Standard Methods for the Examination of Water and Wastewater, 1980; or an equivalent method as specified in the attached Waste Analysis Plan, Attachment II.

(b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

(c) Records of monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

(iv) The individuals who performed the analyses;

(v) The analytical techniques or methods used; and

(vi) The results of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility, within ten (10) days of the decision to make the change.

11. Certification of Construction or Modification. The Permittee may not commence any storage of hazardous waste at modified or newly constructed areas of the facility until:

(a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and

(b) (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.

12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Such notification does not waive Permittee's duty to comply with the permit pursuant to paragraph D.I. of Part I of this permit.

13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

15. Twenty-Four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

(a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.

(b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

(i) Name, address, and telephone number of the owner or operator;

(ii) Name, address, and telephone number of the facility;

(iii) Date, time, and type of incident;

(iv) Name and quantity of materials involved;

(v) The extent of injuries, if any;

(vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in condition I.D.15.

17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

18. Submittal of Written Reports. All written reports required to be submitted by the Permittee pursuant to this permit shall be sent to: U.S. EPA, Region V, Waste Management Division, Attn: Technical, Permits, and Compliance Section, 230 South Dearborn Street, Chicago, Illinois 60604.

E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.

F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.

G. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

(1) Waste analysis plan as required by 40 CFR 264.13 and this permit.

(2) Inspection schedules as required by 40 CFR 264.15(b) and this permit.

(3) Contingency plan as required by 40 CFR 264.53(a) and this permit.

(4) Closure plan as required by 40 CFR 264.112(a) and this permit.

(5) Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.

(6) Operating record as required by 40 CFR 264.73 and this permit.

(7) Inspection schedules as required by 40 CFR 264.15(b) and this permit.

II. GENERAL FACILITY CONDITIONS

A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

B. Required Notice.

(1) The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.

(2) When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.J.1).

C. General Waste Analysis. The Permittee shall follow the procedures described in the attached Waste Analysis Plan, Attachment II.

D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(b) and (c).

E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment III. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).

F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment (IV). The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).

G. General Requirements for Ignitable, Reactive, and Incompatible Waste. The Permitee shall comply with the requirements of 40 CFR 264.17 (a).

H. Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment V, as required by 40 CFR 264.32.

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency, and shall follow the Inspection Plan, shown in Attachment III.

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.

4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35.

5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

I. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment V , and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. Copies of Plan. The Permittee shall maintain and distribute copies of the contingency plan to comply with the requirements of 40 CFR 264.53.

3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, whenever required by 40 CFR 264.54.

4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

J. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76.

K. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6) and (8).

2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.

L. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment VI.

2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.

3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.

4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment VI. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment VI.

5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment VI.

6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.

M. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment VI.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).

2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).

3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

N. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.M. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.

O. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs.

P. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

Q. Financial Assurance and Documentation Requirements.

Where the requirements of 40 CFR §264.143 and §264.147 are met through the use of state-required mechanism pursuant to §264.149, documentation shall be made out to the Director of the Ohio Environmental Protection Agency. Copies shall be submitted to U.S. EPA, Region V office.

III. STORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store up to a total of 24,750 gallons of following wastes in containers at the facility, subject to the terms of this permit:

U.S. EPA Hazardous Waste Number	Hazardous Waste Description
D006	Dust stop waste
F002	Spent halogenated solvents, such as methylene Chloride and 1,1,1 trichloroethane
F003	Spent non-halogenated solvents, such as cychlohexanone
F005	Still bottoms from recovery of spent non-halogenated solvents
F006	Electroplating sludge

B. Conditions of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172.

D. Management of Containers. The Permittee shall manage containers as required by 40 CFR 264.173.

E. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR 264.175.

F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

G. Special Requirements for Incompatible Waste.

1. Prior to placing incompatible wastes or incompatible wastes and materials in the same container, the Permittee shall comply with 40 CFR 264.17 (b).

2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

3. The Permittee shall separate containers of incompatible wastes as required by 40 CFR 264.177(c).

4. The Permittee must document compliance with III.G. (1) and (2) as required by 40 CFR 264.17(c) and place this documentation in the